



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL RESOURCES  
Lee Park, Suite 6010  
555 North Lane  
Conshohocken, PA 19428-2251  
April 29, 1994

Southeast Regional Office

(610) 832-6212  
FAX: (610) 832-6259

Leeds and Northrup  
351 Sunnyside Pike  
P.O. Box 2000  
North Wales, PA 19454

Re: Non-Compliance,  
Hazardous Waste Activity  
I.D. No. PAD002277952  
Leeds and Northrup  
Upper Gwynedd Township  
Montgomery County

Ladies and Gentlemen:

The Department has received and reviewed your response to the Notice of Violation ("Nov") dated March 17, 1994. This NOV was sent to you in regards to violations of the provisions of the Pennsylvania Solid Waste Management Act and the rules and regulations promulgated thereunder.

The Department is satisfied with the corrective and preventive actions which you have undertaken. Therefore, the Department has determined that a meeting at this time to discuss the violations and appropriate penalties is not necessary.

If you have any questions concerning this matter, please do not hesitate to call me at 215 832-6212.

Sincerely,

Charlie Fees  
Waste Management Specialist  
Waste Management Program

Re 30 (RN)117.15

351 Sunnyside Pike  
P.O. Box 2000  
North Wales, PA 19454 USA  
Phone: 215-699-2000  
Fax: 215-699-3702



March 24, 1994

DER-RECEIVED  
SOUTHEAST REGION

MAR 28 1994

Mr. Charles Fees  
Waste Management Specialist  
Commonwealth of Pennsylvania  
Department of Environmental Resources  
Lee Park, Suite 6010  
555 North Lane  
Conshohocken, PA 19428-2251

Re: <sup>1</sup> Notice of Violation - March 15, 1993  
(Non-Compliance, Hazardous Waste Activity)  
<sup>2</sup> My note of February 16, 1994

Dear Mr. Fees:

In my letter of February 16, I reported we had removed additional accumulations of snow that occurred since your visit. We were also somewhat successful at chipping away some of the ice accumulation. We have subsequently been successful in removing all accumulated snow and ice from the collection system.

As you are obviously aware this was one of the most severe winters in terms of precipitation/snow and prolonged cold weather. This rather unique set of circumstances and their duration created the condition of frozen precipitation on our storage pad, despite the fact it is covered by a roof. The storage pad has existed for ten years without similar problems.

As you are aware, only one partially filled 55 gallon drum of waste material was present on the storage pad, thus greatly reducing the probability of an incident. Actually, at no time was the containment capacity of the storage pad less than the total stored volume of waste on the pad - even with the reduced capacity due to icing.

I will contact you by telephone the week of March 28 to set up a meeting to discuss this further.

Very truly yours,

Earl W. Armitage  
Project Engineer

cc: G. T. McAllister  
/aw

351 Sumneytown Pike  
P.O. Box 2000  
North Wales, PA 19454 USA  
Phone: 215-699-2000  
Fax: 215-699-3702

GER-RECEIVED  
SOUTHEAST REGION  
FEB 22 1994



February 16, 1994

Mr. Charles Fees  
Commonwealth of Pennsylvania  
Department of Environmental Resources  
Suite 6010 Lee Park  
555 North Lane  
Conshohocken, PA 19428

Dear Mr. Fees:

This note is to follow up on your visit to our facility with Mr. William Miller on February 3, 1994.

As you are aware, the non-compliant drum labelling and location was corrected prior to your departure.

Regarding the drum accumulation area; we have removed some ice from the cement floor and have shovelled additional accumulations of snow since your visit. We will remove all ice accumulation as it thaws.

If there are any questions, please contact me at 699-2000 X 2420.

Very truly yours,

Earl W. Armitage, Jr.

/aw

cc: G. T. McAllister

file:environ

EPA

## EVALUATION - VIOLATION - ENFORCEMENT FORM

Form V2.0

Handler ID Number		Handler Type	
PADA002277952		LDF[ ] TSF[ ] INC[ ] LQG[ ] SQG[ ] CEG[ ] TRA[ ]	
Handler Name LEEDS & NORTHROP		Contact Name EARL	Date Submitted
		ARHITAGE	031894
Street		City	
SUNNYSIDE PIKE		NORTH WALES	

EVALUATION	Add <input checked="" type="checkbox"/>	Change	Delete	
Date	Number	Agency	Type	Reason Branch Person
020394		5	CEI	WH P.A.C.J.F.

## AREAS OF EVALUATION ( E - Evaluated NE - Not Evaluated NA - Not Applicable )

GER	GPT	GBF	TWD	DGS	DLT	DPB	DWP
GGR	GRR	TGR	DCH	DGW	DMC	DPP	DBF
GLB	GSC	TMR	DCL	DIN	DMR	DSI	CAS
GMR	GSQ	TOR	DCP	DLB	DOR	DTR	FEA
GOR	GEX	TRR	DFR	DLF	DOT	DTT	CSS

Comments

## OUTSTANDING VIOLATIONS COVERED BY ABOVE EVALUATION

Agency	Number	Area	Date Determined	Agency	Number	Area	Date Determined

VIOLATION		Add <input checked="" type="checkbox"/>	Change	Delete	Link to Above Evaluation? (Y/N) y	
Agency	Number	Area	Class	Regulation Type	Regulation Citation	
5		Q.P.T	1	3.2	25 PA CODE 245.178(a)	
Date Determined	Priority	Branch	Person	Returned to Compliance		
020394			P.A.C.J.F.	Scheduled	Actual	
				040694		
Comments NO CONTAINMENT SYSTEM						

VIOLATION		Add	Change	Delete	Link to Above Evaluation? (Y/N)	
Agency	Number	Area	Class	Regulation Type	Regulation Citation	
Date Determined	Priority	Branch	Person	Returned to Compliance		
				Scheduled	Actual	
Comments						

☐ Required ☐ Required If pertinent ☐ Required only for previously reported data ☐ Not Required by EPA

Handler ID Number				Handler Name				Form V2.0			
PND002277952				LEEDS 2 HORTHURP							
VIOLATION		Add	Change	Delete	Link to Above Evaluation? (Y/N)						
Agency	Number	Area	Class	Regulation Type	Regulation Citation						
<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>						
Date Determined		Priority	Branch	Person	Returned to Compliance Scheduled		Actual				
<input type="text"/>		<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>		<input type="text"/>				
Comments											
VIOLATION		Add	Change	Delete	Link to Above Evaluation? (Y/N)						
Agency	Number	Area	Class	Regulation Type	Regulation Citation						
<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>						
Date Determined		Priority	Branch	Person	Returned to Compliance Scheduled		Actual				
<input type="text"/>		<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>		<input type="text"/>				
Comments											
VIOLATION		Add	Change	Delete	Link to Above Evaluation? (Y/N)						
Agency	Number	Area	Class	Regulation Type	Regulation Citation						
<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>						
Date Determined		Priority	Branch	Person	Returned to Compliance Scheduled		Actual				
<input type="text"/>		<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>		<input type="text"/>				
Comments											
ENFORCEMENT											
Add		Change	Delete								
Date	Number	Agency	Type	Branch	Person	Attorney Initials					
031794	<input type="text"/>	5	120	4H	PACJF	<input type="text"/>					
Penalty Assessed \$		<input type="text"/>			Settled \$		<input type="text"/>				
POLLUTION PREVENTION ENFORCEMENT COMPONENTS COVERED BY THIS ACTION											
PPE - Pollution Prevention				EAE - Environmental Auditing							
PRE - Pollution Reduction				EPE - Environmental Public Awareness							
ERE - Environmental Restoration											
VIOLATIONS COVERED BY ABOVE ENFORCEMENT ACTION											
Agency	Number	Area	Date Determined	Agency	Number	Area	Date Determined				
5	<input type="text"/>	GP7	020394	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>				
<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>				
<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>				
<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>				
<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>				
<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>				
PENALTY PAYMENTS											
Date		Amount			Date		Amount				
<input type="text"/>		<input type="text"/>			<input type="text"/>		<input type="text"/>				
<input type="text"/>		<input type="text"/>			<input type="text"/>		<input type="text"/>				
Comments											



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL RESOURCES

Lee Park, Suite 6010  
555 North Lane  
Conshohocken, PA 19428-2251  
March 17, 1994

Southeast Regional Office

(610) 832-6212  
FAX: (610) 832-6259

Leeds & Northrup  
Summeytown Pike  
North Wales, PA 19446

Re: Non-Compliance, Hazardous Waste  
Activity  
I.D. No. PAD002277952  
Leeds & Northrup  
Upper Gwynedd Township  
Montgomery County

NOTICE OF VIOLATION

Gentlemen:

As a result of an inspection conducted by the Department on February 3, 1994, at the Leeds & Northrup Company located at Summeytown Pike in Upper Gwynedd Township, Montgomery County, it has been determined that Leeds & Northrup ("Leeds") is in violation of the Solid Waste Management Act of the Commonwealth of Pennsylvania ("SWMA"), Act of July 7, 1980, P.L. 380, as amended, P.S. §6018.101 et seq., and the rules and regulations promulgated thereunder as follows:

- A. Leeds failed to provide for its hazardous waste containers, a sump or collection system that is capable of holding leaks or spills. The collection system that exists was allowed to fill with precipitation and freeze over, thus rendering the system unfit for containing spills. This is contrary to Section 265.178(a) of the Department's Hazardous Waste Management Regulations.

The activities and conditions described in paragraph A above constitute unlawful conduct pursuant to Sections 403(b)(9), 610(4) and (9) of the SWMA; constitute a public nuisance pursuant to Section 601 of the SWMA; and subject the offender to civil penalty liability pursuant to Section 605 of the SWMA.

In order to achieve compliance with the SWMA, the implementation of the following is recommended:

1. By April 6, 1994, submit a written report to the Department, addressing the circumstances under which these violations occurred, and the actions you have undertaken to correct these violations and prevent their recurrence.



March 17, 1994

2. By April 13, 1994, contact this office to make arrangements to attend a meeting for the purpose of discussing these violations and appropriate penalties.

This letter does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising prior to or after the issuance of this letter or the conditions upon which this letter is based. This letter shall not be construed so as to waive or impair any rights of the Department of Environmental Resources, heretofore or hereafter existing. This letter shall also not be construed as a final action of the Department of Environmental Resources.

If you have any questions concerning this matter, please contact this office.

Sincerely,



Charlie Fees  
Waste Management Specialist  
Waste Management Program

Re 30 (SH)76.2

Hazardous Waste Inspection Report  
Generators - Part A

Date of inspection 2/3/94 Time start 10:15 AM Time finish 4<sup>30</sup> A.H.  
 Name of inspector C. FEES / B. Miller  
 Company, installation name LEEDS & NORTHRUP Corp.  
 Location 351 Sumneytown Pike, North Wales, PA, 19454  
 County Montgomery Municipality Upper Gwynedd Twp.  
 Identification number PAD 002277952  
 Name of responsible official EARL ARMITAGE  
 Title PROJECT ENGINEER  
 Mailing address 351 Sumneytown Pike, North Wales, PA. 19454  
 Area code and telephone number (215) 699-2000  
 Name of person interviewed SAME  
 Title                       
 Mailing address (if different from above)                       
 Area code and telephone number                     

## 1. Current waste handling method:

- a. ☒ On-site    ☐ treatment,    ☐ storage,    ☐ disposal    ☒ PBR  
 b. ☐ On-site    ☐ use,    ☐ reuse,    ☐ recycle,    ☐ reclaim  
 c. ☒ Off-site    ☐ treatment,    ☐ storage,    ☒ disposal  
 d. ☐ Off-site    ☐ use,    ☐ reuse,    ☐ recycle,    ☐ reclaim

## 2. Amount of hazardous waste produced:

- a. ~ 770 kg./mo.  
 b. ~ 9240 kg./yr.

→ THIS FIGURE DOES NOT INCLUDE  
WEIGHTS OF HAZARDOUS WASTE WATER  
TREATED UNDER PERMIT-BY-RULE

## 3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
FO06	ENVIRITE CORP.	YORK, PA PAD010154045
FO01 FO03	SAFETY-KLEEN CORP.	LINDEN, N.J.
FO05		NJD 002182897
DO01 DO39	SAFETY KLEEN CORP	WEST CHESTER, PA.
		PAD 000738849



Hazardous Waste Inspection Report  
Generators - Part B

1-No Violation Observed				2-Not Applicable	3-Not Determined	4-Non-Compliance
Status				REQUIREMENT		Chapter Citation
1	2	3	4			262
X				Hazardous waste determination, copies available		.11
X				Identification number		.12(a)
X				Hazardous waste shipments offered only to licensed transporters		.12(d)
X				Authorization received from TSD facility for wastes shipped off-site		.13
X				PA manifest used for intrastate shipments		.20(b)
X				Disposer state manifest or EPA format manifest used for out-of-state shipments		.20(c)
X				Manifests filled out properly and completely		.20(g), .23(a, b)
X				Manifests routed properly and within time limits (7 days)		.23(c, d, f, g, i)
X				Proper U.S. DOT shipping containers or packages		.30(1)
			X	Shipping containers marked and labeled according to U.S. DOT		.30(2)
			X	Containers of 110 gal. or less marked with required PA label		.30(3)
				Placards offered to transporter		.33
X				Wastes accumulated on-site for less than 90 days		.34(1)
			X	Wastes stored in proper containers and properly marked and labeled		.34(2)
			X	Containers managed in accordance with 265.171-.177		.34(3)
			X	Containers clearly marked with accumulation date and visible for inspection		.34(4)
X				Records retained at designated location for 20 years		.40
X				Quarterly reports submitted to the Department		.41
				Exception reporting procedures followed		.42
X				Hazardous waste disposal plan, if required		.45
X				Spill reporting procedures followed		.46(a)
X				Preparedness, Prevention and Contingency Plan and implemented 265.51-.54		.34(a)(5), .46(e)
	X			Special requirements followed for international shipments		50.53.55.60
X				On the job or classroom personnel training program 265.16		.34(a)(5)
X				Drum accumulation area inspected weekly as per 265.174		.34(a)(3)
X				Manifests legible (all copies)		.23(h)
		X		Tanks managed in accordance with 265.190-.195 SEE CLOSURE COMMENTS		.34(a)(2)
X				Preparedness and Prevention as per 265.31-.37		.34(a)(5)
X				Emergency Procedures as per 265.55-.56		.34(a)(5)

PERMIT BY RULE REQUIREMENTS

1 - no violation observed  
2 - not applicable  
3 - not determined  
4 - noncompliance

Chapter Citation	Requirements	Compliance Status			
		1	2	3	4
265.14(b)(1)	Active portion has 24 hour surveillance.	X			
265.14(b)(2)	Artificial barrier surrounds active portion.	X			
265.14(c)	Proper signs are posted.	X			
265.15(b)(1)	Inspection schedule is on-site.	X			
265.15(c)	Inspections are conducted as per inspection plan.	X			
265.15(d)	Deterioration and/or malfunctions of equipment corrected as revealed by inspections.	X			
265.15(d)	Immediate remedial action taken when a hazard is imminent or already present.	X			
265.15(e)	Inspection log is maintained and utilized properly.	X			
265.32(1)	Facility is equipped with internal alarm system capable of providing immediate emergency instruction to personnel.	X			
265.32(2)	Facility is capable of summoning outside emergency assistance.	X			
265.32(3)	Facility is equipped with spill and decontamination control equipment.	X			
265.33	Facility communications and/or alarm systems and spill and decontamination control equipment is periodically tested and maintained.	X			
265.35	Adequate aisle space is maintained to allow unrestricted access for personnel and emergency equipment.	X			
265.53(1)	A copy of the PPC plan and all revisions to the plan is available at the facility.	X			
265.52(d)	The contingency plan contains an up-to-date list of names, addresses and phone numbers of all persons qualified to act as emergency coordinator.	X			
265.55	One employee is designated as the primary emergency coordinator and is either on-site or on call at all times.	X			
265.73(a)	Operating records are maintained at the facility. Records contain the following:				
265.73(b)(1)	Description and quantities of wastes treated and discharged under PBR. <sup>SEE</sup> <del>265.13</del> <sup>APPENDIX</sup>	X			
265.73(b)(3)	Results of waste analyses and trial tests performed under 265.13. <sup>11</sup>	X			
265.73(b)(4)	Summary reports and details of any incidents requiring implementation of the contingency plan.				

**PERMIT BY RULE REQUIREMENTS**  
(Continued)

1 - no violation observed  
2 - not applicable  
3 - not determined  
4 - noncompliance

Chapter Citation	Requirements	Compliance Status			
		1	2	3	4
265.73(b)(5)	Results of all on-site inspections, including those outlined in 265.15(e) below.	X			
265.77(a)	Emissions, discharges, fires, explosions and groundwater contamination reported to the Department as required.	X			
265.74(a)	Records maintained under Section 264(k) are available to the Department.	X			
265.177 265.17(a)(b)	Special precautions are taken to prevent accidental ignition or reaction of hazardous wastes.	X			
265.173(b) 265.194(b)	Hazardous waste or treatment reagents are not placed in a treatment process or equipment if they could cause it to rupture, leak, corrode or otherwise fail.	X			
265.194(2)	Continuously fed equipment is fitted with a means of stopping the inflow.	X			
265.194(e)	When facility treats a waste which is substantially different from previously treated wastes, the owner or operator shall:  Conduct waste analyses and trial treatment tests or substitute written documentation to show that the proposed process will not cause ignition, reaction, or damage to equipment.	X			
265.195(1)	The following minimum inspections are performed and results recorded: Discharge control and safety equipment at least once each operating day.	X			
265.195(2)(3)	Data from process monitoring equipment at least once each operating day to ensure proper operation.	X			
265.195(4)	Construction materials of the treatment process and equipment at least once weekly to detect corrosion or leaks.	X			
265.195(5)	Construction materials of discharge containment structures and immediate surrounding area at least weekly to detect erosion or leaking.	X			

## Inspection Report Comments

Date of Inspection 2-3-94 Identification Number PA D 002277952  
Company/Facility/Site Name LEEDS 2 NORTHROP

CONDUCTED A HAZARDOUS WASTE INSPECTION OF THIS INSTRUMENT  
MANUFACTURED THAT BOTH GENERATES AND TREATS SOME OF ITS  
HAZARDOUS WASTE. PERMISSION FOR INSPECTION GRANTED BY  
EPA ARBITRAGE. ALSO PRESENT FROM PA DEP WAS BILL MILLER

1. LARGE QUANTITY GENERATOR

THE FIRST AREAS EVALUATED WERE LEEDS GENERATED WASTES THAT  
ARE SHIPPED OFF-SITE FOR DISPOSAL. THIS INCLUDES:

1. VARIOUS PAINT RELATED WASTES (F005)
2. VARIOUS WASTE FLAMMABLE LIQUIDS (F003, D001, D039)
3. PLATING SLUDGE (F006)

WASTE TYPES 1 and 2 ARE TRANSPORTED OFF-SITE BY SAFETY-KLEEN AND  
SENT TO THE SAFETY KLEEN FACILITY IN LINDEN, N.J. OR WEST CHESTER, PA.  
APPROX. 415 Kg/MONTH OF WASTE IS SHIPPED MONTHLY.

WASTE TYPE 3 IS TRANSPORTED OFF-SITE BY ENVIRTE IN YORK, PA.  
APPROX 415 Kg/MONTH OF THIS WASTE TYPE IS SHIPPED OFF-SITE MONTHLY.

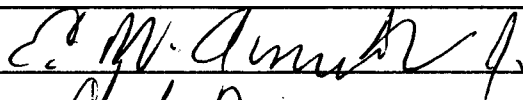
In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve as a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (signature)



Date

2-3-94

Inspector (signature)



Date

2-3-94Page 5 of 10

OBSERVED IN THE PAINT ROOM WAS ONE DRUM OF WHAT APPEARED TO BE HAZARDOUS PAINT WASTE. THE STORING OF THIS DRUM WAS IN VIOLATION OF THE FOLLOWING REGULATIONS:

25 PA CODE 262.30(3) → THIS DRUM DID NOT HAVE A "HAZARDOUS WASTE" LABEL.

25 PA CODE 265.178(4) → THIS DRUM WAS NOT STORED IN THE BERNED AREA OF THE ROOM, AND THUS HAD NO CONTAINMENT SYSTEM.

25 PA CODE 265.173(a) → THIS DRUM WAS NOT COMPLETELY CLOSED

CONCERNED ABOUT THE MISMANAGEMENT OF THIS DRUM, E. ARCHITECTURE HAD THE ABOVE 3 VIOLATIONS CORRECTED WITHIN 3 HOURS OF THEIR BEING OBSERVED.

ALSO OBSERVED IN THIS PAINT ROOM WERE 1 DRUM (55 GAL) AND 2 PAILS (5-GAL) OF WHAT THE FACILITY IDENTIFIED AS PAINT RELATED RESIDUAL WASTE. IT IS RECOMMENDED THAT THESE CONTAINERS BE PROPERLY IDENTIFIED (E.G. - A LABEL THAT READS "RESIDUAL WASTE" OR "NON-HAZARDOUS" AND SAFELY STORED IN THE SAME BERNED AREA AS THE HAZARDOUS WASTE CONTAINER.)

THE NEXT AREA OF INSPECTION WAS THE OUTDOOR WASTE DRUM ACCUMULATION AREA. AT TIME OF INSPECTION THIS AREA CONTAINED 1 HAZARDOUS, 1 RESIDUAL, AND 2 DOZEN EMPTY BARRELS.

ALTHOUGH THE AREA HAS A ROOF, THERE ARE NO WALLS. PRECIPITATION HAD ENTERED THIS AREA, AND SUBSEQUENTLY FROZE. THIS HAS RENDERED THE CONTAINMENT

## Inspection Report Comments

Date of Inspection 2-3-94 Identification Number PAD 002277952  
Company/Facility/Site Name LEEDS & NORTHROP

AREA UNUSABLE. THE VIOLATION HERE IS 25 PA CODE  
247.178(a)(2), (b). ATTEMPTS SHOULD BE MADE TO  
REMOVE COLLECTED PRECIPITATION BEFORE FREEZING TAKES PLACE.

2. PERMIT-BY-RULE

LEEDS, AS A RESULT OF ITS ELECTROPLATING OPERATIONS,  
PRODUCES & THEN SUBSEQUENTLY TREATS WASTE WATER FROM  
ITS LARGE ELECTROPLATING AREA. THIS WASTE WATER HAS  
BEEN DECLARED "HAZARDOUS", ALTHOUGH NO WASTE ANALYSIS  
RECORDS EXIST TO VERIFY THIS CLAIM. VIA THE PERMIT-BY-RULE  
STATUS, LEEDS OPERATES A ROTARY VACUUM FILTER TO PRECIPITATE  
METAL SLUDGE. THIS SLUDGE IS SHIPPED OFFSITE AS FOOD  
HAZARDOUS WASTE. DAILY RECORDS SHOW THAT THE FILTER IS  
OPERATED AN AVERAGE TWICE MONTHLY. APPROX 700 GALLONS OF  
WATER IS PROCESSED EACH TIME. THIS FACT ALONE MAKES LEEDS  
A VERY LARGE QUANTITY GENERATOR OF HAZARDOUS WASTE. E. ARMITAGE  
SHOWED THE DEC 1993, DISCHARGE MONITORING REPORT, WHICH

*In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.*

*This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.*

*This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.*

*Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.*

Person Interviewed (signature) \_\_\_\_\_ Date \_\_\_\_\_

Inspector (signature) \_\_\_\_\_ Date \_\_\_\_\_

Page 7 of 10

SHOWED THAT THE EFFLUENT METALS TOTALS ARE WELL BELOW THE NPDES PERMIT REQUIREMENT LIMITS. WATER DISCHARGED TO DOBSONORTH RUN ( TRIBUTARY OF WISSAHICKON) CREEK

### 3. RESIDUAL WASTE GENERATION

EARL ARMITAGE PRODUCED THE RESIDUAL WASTE BIENNIAL REPORT WHICH WAS SUBMITTED 4-26-93. THIS REPORT DECLARED PAINT BOOTH FILTERS BEING DISPOSED OF AT POTTS TOWN LANDFILL.

OBSERVATIONS MADE DURING THE INSPECTION REVEALED THAT LEEDS PRODUCES MANY OTHER BY PRODUCTS THAT SHOULD BE DECLARED AS RESIDUAL WASTE:

- WATER BASED COOLANTS
- COMPRESSOR OIL (MINERAL OIL)
- STEEL & BRASS SCRAP (PIPES, MACHINE TURNINGS WIRES, MOTORS, STAMPING SCRAPS AND EMPTY DRUMS)
- RESIDUAL CARDBOARD
- RESIDUAL WOODEN PALLETS

THE ABOVE ITEMS SHOULD BE DECLARED AND QUANTITIES SHIPPED AND DESTINATION FACILITY. REPORTED ON THE NEXT RESIDUAL WASTE BIENNIAL REPORT DUE MARCH 1, 1995.

## Inspection Report Comments

Date of Inspection 2-3-94 Identification Number PAD 002277952  
Company/Facility/Site Name LEEDS & NORTHROP

4. RESIDUAL WASTE WATER DISCHARGED TO POTW

LEEDS OPERATES AN AQUEOUS BASE CLEAN WASH LINE. THIS LINE REPLACES THE VAPOR DECREASER. THIS WASTE MINIMIZATION STEP HAS ELIMINATED THE USE OF 1,1,1 TRI-CHLOROETHANE AT THE FACILITY.

THIS WASHER DISCHARGES APPROX 800 GALLONS / DAY TO THE UPPER MERYMEAD TOWNSHIP AUTHORITY (UMTA). LEEDS IS SUBMITTING MONTHLY DISCHARGE REPORTS TO EPA & PA DEP. THIS WATER IS A RESIDUAL WASTE.

5. PENDING PLANT SHUTDOWN

E. ARMITAGE STATED THAT MANUFACTURING OPERATIONS MAY SHUT DOWN AT THE END OF 1994. THIS WOULD VIRTUALLY ELIMINATE WASTE PRODUCTION AND WOULD DOWNGRADE LEED'S STATUS TO A SMALL QUANTITY GENERATOR. PERMIT-BY-RULE OPERATIONS WOULD END.

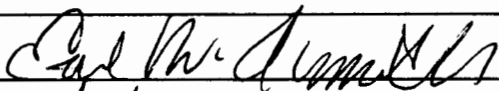
In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve as a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (signature)



Date

2-3-94

Inspector (signature)



Date

2-3-94



IF CLOSURE TAKES PLACE, LEADS MUST DECONTAMINATE AND REMOVE ALL WASTES & RESIDUES FROM THEIR LARGE ELECTROPLATE ROOM.

IN THIS AREA, ALL THE CONTAINMENT FLOORS & SUMPS APPEAR TO BE COATED WITH RESIDUES. AT TIME OF INSPECTION ALL SUMPS COULD NOT BE EVALUATED FOR IMPERMEABILITY. THE MAGNITUDE OF THE PLATING TANK CONTAINMENT AREA WILL REQUIRE A MAJOR EVALUATION TO DETERMINE COMPLIANCE WITH CLOSURE REQUIREMENTS OF 25 PA CODE 265.178 (d),

Hazardous Waste Inspection Report  
Land Disposal Restriction Supplemental Checklist

1-No Violation Observed				2-Not Applicable	3-Not Determined	4-Non-Compliance
Status				REQUIREMENT		Citation
1	2	3	4			40 CFR Part 268
				<b>Generators</b>		
X				Notification sent with shipments of wastes that do not meet treatment standards.		7(a)(1)
X				Notification and certification sent with shipments of wastes meeting treatment standards.		7(a)(2)
X				Dilution not used as a substitute for treatment.		3
X				Records maintained of notifications, certifications, waste analysis, and documentation supporting use of knowledge for waste classification.		7(a)(5), (a)(6)
				<b>Storage Facilities</b>		
				Facility verifies generators classification of waste in accordance with waste analysis plan.		25 Pa Code 265.13(c)
				Containers marked to identify contents and accumulation date.		50(a)(2)
				Notification sent with shipments of wastes that do not meet treatment standards.		7(a)(1)
				Notification and certification sent with shipments of wastes meeting treatment standards.		7(a)(2)
				Facility maintains records of documents produced pursuant to LDR requirements.		7(a)(6)
				<b>Treatment Facilities, including PBR and RRR Facilities</b>		
X				Dilution not used as a substitute for treatment.		3
X				Facility tests wastes or treatment residues to determine compliance with applicable treatment standards in accordance with waste analysis plan.		7(b)
X				Certification and/or notification sent with shipments of waste.		7(b)(4), (b)(5), (b)(6)
				<b>Land Disposal Facilities</b>		
				Facility tests wastes received to assure compliance with applicable treatment standards.		7(c)(2)
				Facility land disposes of restricted waste only if it meets applicable treatment standard.		40
				Facility retains copies of generator notifications and certifications.		7(c)(1)

Hazardous Waste Inspection Report  
Generators - Part A

Date of inspection 1-26-93 Time start \_\_\_\_\_ Time finish \_\_\_\_\_  
 Name of inspector CHARLES FEES  
 Company, installation name LEEDS & NORTHRUP  
 Location SUMNEYTOWN PIKE, NORTH WALES, PA-19454  
 County MONTGOMERY Municipality UPPER Cwynedd TWP.  
 Identification number PAD 002277952  
 Name of responsible official EARL ARMITAGE  
 Title PROJECT ENGINEER  
 Mailing address SAME  
 Area code and telephone number (215) 699-2000  
 Name of person interviewed \_\_\_\_\_  
 Title \_\_\_\_\_  
 Mailing address (if different from above) \_\_\_\_\_  
 Area code and telephone number \_\_\_\_\_

## 1. Current waste handling method:

- a. ☒ On-site ☐ treatment, ☐ storage, ☐ disposal ☒ PBR  
 b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim  
 c. ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal  
 d. ☐ Off-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim

## 2. Amount of hazardous waste produced:

- a. normally 2,500 kg./mo. based on 4<sup>RTM</sup> quarters 1992  
 b. \_\_\_\_\_ kg./yr.

## 3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
F006	ENVIRITE CORPORATION	YORK, PA PA D010154645
F005, F003 F001	SAFETY KLEEN CORP.	LINDEN N.J. NSD 002182897
D001, D039	"	WINCHESTER PA. PA D006738849
	RENTECH	LEWIS BURY PA. PA D007098022

Hazardous Waste Inspection Report  
Generators — Part B

1—No Violation Observed				2—Not Applicable	3—Not Determined	4—Non-Compliance	Chapter Citation
Status				REQUIREMENT			
1	2	3	4				262
✓				Hazardous waste determination, copies available			.11
✓				Identification number			.12(a)
✓				Hazardous waste shipments offered only to licensed transporters			.12(d)
✓				Authorization received from TSD facility for wastes shipped off-site			.13
✓				PA manifest used for intrastate shipments			.20(b)
✓				Disposer state manifest or EPA format manifest used for out-of-state shipments			.20(c)
✓				Manifests filled out properly and completely			.20(g)
✓				Manifests routed properly and within time limits (7 days)			.23(e) or .24
✓				Proper U.S. DOT shipping containers or packages			.30(1)
		✓		Shipping containers marked and labeled according to U.S. DOT			.30(2)
✓				Containers of 110 gal. or less marked with required PA label			.30(3)
✓				Placards offered to transporter			.33
		✓		Wastes accumulated on-site for less than 90 days			.34(1)
		✓		Wastes stored in proper containers and properly marked and labeled			.34(2)
		✓		Containers managed in accordance with 265.171-.177			.34(3)
			✓	Containers clearly marked with accumulation date and visible for inspection			.34(4)
✓				Records retained at designated location for 20 years			.40
✓				Quarterly reports submitted to the Department			.41
✓				Exception reporting procedures followed			.42
		✓		Hazardous waste disposal plan, if required			.45
✓				Spill reporting procedures followed			.46(a)
✓				Preparedness, Prevention and Contingency Plan and implemented			.46(e)
	✓			Special requirements followed for international shipments			50.53.55.60
		✓		On the job or classroom personnel training program 265.16			.34(a)(5)
✓				Drum accumulation area inspected weekly as per 265.174			.34(a)(3)

2 - not applicable  
 3 - not determined  
 4 - noncompliance

Chapter Citation	Requirements	Compliance Status			
		1	2	3	4
265.14(b)(1)	Active portion has 24 hour surveillance.	✓			
265.14(b)(2)	Artificial barrier surrounds active portion.	✓			
265.14(c)	Proper signs are posted.	✓			
265.15(b)(1)	Inspection schedule is on-site.	✓			
265.15(c)	Inspections are conducted as per inspection plan.	✓			
265.15(d)	Deterioration and/or malfunctions of equipment corrected as revealed by inspections.	✓			
265.15(d)	Immediate remedial action taken when a hazard is imminent or already present.	✓			
265.15(e)	Inspection log is maintained and utilized properly.	✓			
265.32(1)	Facility is equipped with internal alarm system capable of providing immediate emergency instruction to personnel.	✓			
265.32(2)	Facility is capable of summoning outside emergency assistance.	✓			
265.32(3)	Facility is equipped with spill and decontamination control equipment.			✓	
265.33	Facility communications and/or alarm systems and spill and decontamination control equipment is periodically tested and maintained.	✓			
265.35	Adequate aisle space is maintained to allow unrestricted access for personnel and emergency equipment.	✓			
265.53(1)	A copy of the PPC plan and all revisions to the plan is available at the facility.			✓	
265.52(d)	The contingency plan contains an up-to-date list of names, addresses and phone numbers of all persons qualified to act as emergency coordinator.			✓	
265.55	One employee is designated as the primary emergency coordinator and is either on-site or on call at all times.	✓			
265.73(a)	Operating records are maintained at the facility. Records contain the following:	✓			
265.73(b)(1)	Description and quantities of wastes treated and discharged under PBR.	✓			
265.73(b)(3)	Results of waste analyses and trial tests performed under 265.13.			✓	
265.73(b)(4)	Summary reports and details of any incidents requiring implementation of the contingency plan.	✓			

PERMIT BY RULE REQUIREMENTS  
(Continued)

1 - no violation obs.  
2 - not applicable  
3 - not determined  
4 - noncompliance

Chapter Citation	Requirements	Compliance Status			
		1	2	3	4
265.73(b)(5)	Results of all on-site inspections, including those outlined in 265.15(e) below.	✓			
265.77(a)	Emissions, discharges, fires, explosions and groundwater contamination reported to the Department as required.	✓			
265.74(a)	Records maintained under Section 264(k) are available to the Department.				
265.177 265.17(a)(b)	Special precautions are taken to prevent accidental ignition or reaction of hazardous wastes.	✓			
265.173(b) 265.194(b)	Hazardous waste or treatment reagents are not placed in a treatment process or equipment if they could cause it to rupture, leak, corrode or otherwise fail.	✓			
265.194(2)	Continuously fed equipment is fitted with a means of stopping the inflow.			✓	
265.194(e)	When facility treats a waste which is substantially different from previously treated wastes, the owner or operator shall:  Conduct waste analyses and trial treatment tests or substitute written documentation to show that the proposed process will not cause ignition, reaction, or damage to equipment.			✓	
	The following minimum inspections are performed and results recorded:	✓			
265.195(1)	Discharge control and safety equipment at least once each operating day.				
265.195(2)(3)	Data from process monitoring equipment at least once each operating day to ensure proper operation.				
265.195(4)	Construction materials of the treatment process and equipment at least once weekly to detect corrosion or leaks.	✓			
265.195(5)	Construction materials of discharge containment structures and immediate surrounding area at least weekly to detect erosion or leaking.	✓			

## Inspection Report Comments

Date of Inspection 1/24/93 Identification Number PAD 02277952  
Company/Facility/Site Name LEEDS 2 NORTHROP

LQC

- Conducted a generator inspection of the process instrumentation mfg. noted by Earl Armitage. One violation noted -
- 25 PA CODE SECTION 262.34(4) - In the drum storage area 2 of the 4 drums had accumulation date blurred and dissolved probably from outside humidity. These date were illegible. Earl Armitage was asked to provide better labels.
- No other violations but a few conditions to be addressed.
1. Near the vapor degreaser, a 3'x3'x3' square container  $\frac{1}{2}$  full of what appears to be used oil. This material should be identified and a cover provided if hazardous.
  2. The 55-gal drum in the paint storage room was not contained. This drum should be moved to the area of the room that has a bermed lip.
  3. In the vacuuming room, 2 empty drums buckled and damaged. These drums should not be used for containing FOG sludge.

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This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (signature)

Earl A. Armitage

Date

1-26-93

Inspector (signature)

Charles J. Zito

Date

1-26-93

Page \_\_\_\_ of \_\_\_\_

PERMIT BY RULE

PAD 002277952 for LQG

Conducted inspection of LEEDS 2 NORTH RUP's treatment & discharge system, a PBR operation

PBR appears to be handled properly. The quantities of waste treated are recorded on log sheets. The descriptions are harder to ascertain but the sludge is properly manifested as hazardous waste. Monitors (pH) are keeping track of pH of water discharged into water basin. The incoming pH is not determined, but the pH is adjusted to facilitate metal precipitation (The precipitate is the F006 waste, transported off-site by ENVIRITE)

If the inspection were available and a FORM 55 ANH has been sent to Harrisburg as per E. ARMITAGE.

The PPC plan is available but needs to be updated. E.C. - The old DER phone number was listed. E. ARMITAGE was instructed to place the following DER nos.

032-6212 - general

032-6000 - all purpose emergency no.

in the PPC. He was advised to check to see if other agency's nos. need updating.

No violations observed.



Hazardous Waste Inspection Report  
Generators - Part A

Date of inspection 3/17/92 Time start \_\_\_\_\_ Time finish \_\_\_\_\_  
 Name of inspector RICHARD J. ILLIS  
 Company, installation name LEEDS AND NORTHROP  
 Location 351 SUMMITTOWN PIKE, NORTH WALES, PA. 19454  
 County MONTGOMERY Municipality UPPER Gwynedd  
 Identification number PAU 002277952  
 Name of responsible official MR EARL BRITAGE  
 Title PROJECT ENGINEER  
 Mailing address same  
 Area code and telephone number 215-699-2000  
 Name of person interviewed \_\_\_\_\_  
 Title \_\_\_\_\_  
 Mailing address (if different from above) \_\_\_\_\_  
 Area code and telephone number \_\_\_\_\_

## 1. Current waste handling method:

- a. ☒ On-site ☐ treatment, ☒ storage, ☐ disposal ☒ PBR  
 b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim  
 c. ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal  
 d. ☒ Off-site ☐ use, ☐ reuse, ☒ recycle, ☐ reclaim

## 2. Amount of hazardous waste produced:

- a. \_\_\_\_\_ 13,235 kg./mo.  
 b. \_\_\_\_\_ 158,820 kg./yr.

## 3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
F006	ENVIRITE CORP	1600 PENNSYLVANIA AVE., YARRK, PA, 1740
F005, F001 F003	SAFETY KLEEN CORP	1200 SYLVAN ST., LINDEN, NJ, 07036
D001/D039	SAFETY KLEEN	1140-1142 GREENHILL RD. WESTCHESTER, PA., 19380
D001/D008	ECOFLO, INC.	2750 PATTERSON ST. GREENSBORO, NC 27407

# Hazardous Waste Inspection Report Generators - Part B

1—No Violation Observed				2—Not Applicable	3—Not Determined	4—Non-Compliance	
Status				REQUIREMENT			Chapter Citation
1	2	3	4				75.262
X				Hazardous waste determination, copies available			(b)
X				Identification number			(c)(1)
X				Hazardous waste shipments offered only to licensed transporters			(c)(4)
X				Authorization received from TSD facility for wastes shipped off-site			(d)
X				PA manifest used for intrastate shipments			(e)(2)
X				Disposer state manifest or EPA format manifest used for out-of-state shipments			(e)(3)
X				Manifests filled out properly and completely			(e)(7)
X				Manifests routed properly and within time limits (7 days)			(e)(14) or (15)
X				Proper U.S. DOT shipping containers or packages			(f)(1)(i)
X				Shipping containers marked and labeled according to U.S. DOT			(f)(1)(ii)
X				Containers of 110 gal. or less marked with required PA label			(f)(1)(iii)
		X		Placards offered to transporter			(f)(2)
				Wastes accumulated on-site for less than 90 days			(g)(1)(i)
X				Wastes stored in proper containers and properly marked and labeled			(g)(1)(ii)
X				Containers managed in accordance with 75.265(q)(1)–(9)			(g)(1)(iii)
X				Containers clearly marked with accumulation date and visible for inspection			(g)(1)(iv)
X				Records retained at designated location for 20 years			(h)
X				Quarterly reports submitted to the Department			(i)
X				Exception reporting procedures followed			(j)
	X			Hazardous waste disposal plan, if required			(k)
X				Spill reporting procedures followed			(m)(1)
X				Preparedness, Prevention and Contingency Plan and implemented			(m)(5)
	X			Special requirements followed for international shipments			(o)
X				On the job or classroom personnel training program [75.265(f)]			(g)(1)(v)
X				Drum accumulation area inspected weekly as per 75.265(q)(5)			(g)(1)(iii)
	X			Tank [75.265(r)]			(g)(1)(ii)
X				Preparedness and Prevention procedures [75.265(h)]			(g)(1)(v)
X				Emergency procedures [75.265(i)]			(g)(1)(v)
X				Manifests legible (all copies)			(e)(17)

Hazardous Waste Inspection Report  
Land Disposal Restriction Supplemental Checklist

1-No Violation Observed				2-Not Applicable	3-Not Determined	4-Non-Compliance
Status				REQUIREMENT		Citation
1	2	3	4			40 CFR Part 268
				<b>Generators</b>		
X				Notification sent with shipments of wastes that do not meet treatment standards.		7(a)(1)
X				Notification and certification sent with shipments of wastes meeting treatment standards.		7(a)(2)
X				Dilution not used as a substitute for treatment.		3
X				Records maintained of notifications, certifications, waste analysis, and documentation supporting use of knowledge for waste classification.		7(a)(5), (a)(6)
				<b>Storage Facilities</b>		
				Facility verifies generators classification of waste in accordance with waste analysis plan.		25 Pa Code 265.13(c)
				Containers marked to identify contents and accumulation date.		50(a)(2)
				Notification sent with shipments of wastes that do not meet treatment standards.		7(a)(1)
				Notification and certification sent with shipments of wastes meeting treatment standards.		7(a)(2)
				Facility maintains records of documents produced pursuant to LDR requirements.		7(a)(6)
				<b>Treatment Facilities, including PBR and RRR Facilities</b>		
X				Dilution not used as a substitute for treatment.		3
X				Facility tests wastes or treatment residues to determine compliance with applicable treatment standards in accordance with waste analysis plan.		7(b)
X				Certification and/or notification sent with shipments of waste.		7(b)(4), (b)(5), (b)(6)
				<b>Land Disposal Facilities</b>		
				Facility tests wastes received to assure compliance with applicable treatment standards.		7(c)(2)
				Facility land disposes of restricted waste only if it meets applicable treatment standard.		40
				Facility retains copies of generator notifications and certifications.		7(c)(1)

PERMIT BY RULE REQUIREMENTS

1 - no violation observed  
2 - not applicable  
3 - not determined  
4 - noncompliance

Chapter Citation	Requirements	Compliance Status			
		1	2	3	4
265.14(b)(1)	Active portion has 24 hour surveillance.	X			
265.14(b)(2)	Artificial barrier surrounds active portion.	X			
265.14(c)	Proper signs are posted.	X			
265.15(b)(1)	Inspection schedule is on-site.	X			
265.15(c)	Inspections are conducted as per inspection plan.	X			
265.15(d)	Deterioration and/or malfunctions of equipment corrected as revealed by inspections.	X			
265.15(d)	Immediate remedial action taken when a hazard is imminent or already present.	X			
265.15(e)	Inspection log is maintained and utilized properly.	X			
265.32(1)	Facility is equipped with internal alarm system capable of providing immediate emergency instruction to personnel.	X			
265.32(2)	Facility is capable of summoning outside emergency assistance.	X			
265.32(3)	Facility is equipped with spill and decontamination control equipment.	X			
265.33	Facility communications and/or alarm systems and spill and decontamination control equipment is periodically tested and maintained.	X			
265.35	Adequate aisle space is maintained to allow unrestricted access for personnel and emergency equipment.	X			
265.53(1)	A copy of the PPC plan and all revisions to the plan is available at the facility.	X			
265.52(d)	The contingency plan contains an up-to-date list of names, addresses and phone numbers of all persons qualified to act as emergency coordinator.	X			
265.55	One employee is designated as the primary emergency coordinator and is either on-site or on call at all times.	X			
265.73(a)	Operating records are maintained at the facility. Records contain the following:	X			
265.73(b)(1)	Description and quantities of wastes treated and discharged under PBR.	X			
265.73(b)(3)	Results of waste analyses and trial tests performed under 265.13.	X			
265.73(b)(4)	Summary reports and details of any incidents requiring implementation of the contingency plan.	X			

PERMIT BY RULE REQUIREMENTS  
(Continued)

1 - no violation observed  
2 - not applicable  
3 - not determined  
4 - noncompliance

Chapter Citation	Requirements	Compliance Status			
		1	2	3	4
265.73(b)(5)	Results of all on-site inspections, including those outlined in 265.15(e) below.	X			
265.77(a)	Emissions, discharges, fires, explosions and groundwater contamination reported to the Department as required.	X			
265.74(a)	Records maintained under Section 264(k) are available to the Department.	X			
265.177 265.17(a)(b)	Special precautions are taken to prevent accidental ignition or reaction of hazardous wastes.	X			
265.173(b) 265.194(b)	Hazardous waste or treatment reagents are not placed in a treatment process or equipment if they could cause it to rupture, leak, corrode or otherwise fail.	X			
265.194(2)	Continuously fed equipment is fitted with a means of stopping the inflow.		X		
265.194(e)	When facility treats a waste which is substantially different from previously treated wastes, the owner or operator shall:  Conduct waste analyses and trial treatment tests or substitute written documentation to show that the proposed process will not cause ignition, reaction, or damage to equipment.		X		
265.195(1)	The following minimum inspections are performed and results recorded:  Discharge control and safety equipment at least once each operating day.	X			
265.195(2)(3)	Data from process monitoring equipment at least once each operating day to ensure proper operation.		X		
265.195(4)	Construction materials of the treatment process and equipment at least once weekly to detect corrosion or leaks.	X			
265.195(5)	Construction materials of discharge containment structures and immediate surrounding area at least weekly to detect erosion or leaking.	X			

## Inspection Report Comments

Date of Inspection 3/19/92 Identification Number PAD 002277952  
Company/Facility/Site Name LEEDS AND NORTHRUP

PERMISSION TO CONDUCT THE INSPECTION GIVEN BY MR. EARL ARMISTAGE,  
PROJECT ENGINEER.

NO VIOLATIONS NOTED AT TIME OF INSPECTION.

WARNING SIGNS TO ACTIVE AREA OF FACILITY HAVE BEEN TEMPORARILY  
REMOVED AS WALLS ARE CURRENTLY BEING PAINTED. SIGNS WILL BE RE-  
HUNG IN ABOUT ONE WEEK AT COMPLETION OF PROJECT.

HAZARDOUS ZINC AND NICKEL FILTERS WHICH ARE GENERATED IN THE  
ACTIVE AREA ARE NOW BEING CHANGED ON AN AS-NEEDED BASIS, AS OPPOSED  
TO ROUTINE REPLACEMENT. THIS ALLOWS FOR A LONGER FILTER LIFE WHICH  
AIDS IN HAZARDOUS WASTE MINIMIZATION.

FILTER PRESS ROOM WHERE TREATMENT SLUDGE IS DEWATERED IS  
CLEAN - DRUMS OF WASTE ARE PROPERLY LIDDED AND LABELED.

THE TREATMENT TANK IN THE ACTIVE PORTION OF THE FACILITY SHOULD  
BE "ACURATELY LABELED SO TO IDENTIFY THE WASTE." THE INSPECTION  
SCHEDULE OF THE TANK SHOULD BE MODIFIED TO INCLUDE: 1) LEVEL OF  
WASTE IN THE TANK - DAILY; 2) PRESENCE OF SAFETY EQUIPMENT (FIRE, SPILL  
AND COMMUNICATION); AND 3) INTEGRITY OF THE CONTAINMENT SYSTEM AND  
SUMP. (THE SUMP IS CURRENTLY CLEANED APPROX. EVERY 3 WEEKS.)

SPILL CONTROL EQUIPMENT IS NOT STORED IN THE ACTIVE AREA.  
ABSORBANT PADS, LITTER, ETC. COULD BE STORED THERE TO IMPROVE SAFETY.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (signature) COPY MAILED TO FACILITY Date \_\_\_\_\_

Inspector (signature) Richard J. Kelly Date 3/25/92

Page 6 of 7

## Inspection Report Comments

Date of Inspection 3/19/92 Identification Number PAD002277952  
Company/Facility/Site Name LEEDS AND NORTHRUP

RECOMMENDATION TO KEEP BETTER AND IMPROVED DOCUMENTATION OF INSPECTIONS OF THE CONTAINED ACCUMULATION AREA. A BUILD-UP OF DEBRIS IN THE DRAINAGE CHANNEL OF THE CONTAINMENT BASE STRUCTURE WAS OBSERVED. SUCH MATERIALS <sup>CAN</sup> MASK CRACKS AND OTHER DEFECTS. THE BASE AND SUMP SHOULD BE EVALUATED AS TO THE NEED FOR BEING RESEALED. SEALING MATERIALS SHOULD BE CHOSEN SO AS NOT TO BE AFFECTED BY THE PRODUCTS OR WASTES STORED IN THE CONTAINMENT STRUCTURE.

FACILITY PPC PLAN IS CURRENTLY BEING UPDATED. ANY REQUESTIONS SHOULD BE SUPPLIED TO THE DEPARTMENT FOR APPROVAL.

SOME DRUMS OBSERVED IN THE STORAGE AREA (EMPTIES) SHOULD BE DISPOSED AS THEY SHOW SIGNS OF CORROSION. SUCH DRUMS SHOULD NOT BE USED TO STORE WASTE MATERIAL.

TWO DRUMS CONTAINING LIGHT BALLASTS (POTENTIALLY HOLDING PCB OIL) WERE OBSERVED. THE DEPT WILL ATTEMPT TO SUGGEST SOME DISPOSAL OPTIONS.

TC RULE

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (signature) COPY MAILED TO FACILITY Date \_\_\_\_\_

Inspector (signature) Richard J. Kelly Date 3/25/92

Page 7 of 7



# EVALUATION - VIOLATION - ENFORCEMENT FORM I

<b>HANDLER</b>					Date Submitted						
ID Number	P 10002277952				LDF <input type="checkbox"/>	TSF <input checked="" type="checkbox"/>	INC <input type="checkbox"/>	LOG <input checked="" type="checkbox"/>	SOG <input type="checkbox"/>	TRA <input type="checkbox"/>	090691
Handler Name											

Street		LEEDS + NORTHCLIFF		City		NORTH CUPLES	
351 SUMMITTOWN PIKE							

<b>EVALUATION</b>							
Add <input checked="" type="checkbox"/>		Change <input type="checkbox"/>		Delete <input type="checkbox"/>			
Date	Number	Agency	Type	Reason	Branch	Person	
82291		S	CSE				
Areas of Evaluation ( E - Evaluated, NE - Not Evaluated, NA - Not Applicable )							
GOR	TGR	DCN	DGM	DMC	DPP	CAS	
GPT	THR	DCL	DIN	DMR	DSI	FEA	
GGR	GRR	TOR	DCP	DLB	DOR	DTR	
GLB	GSC		DFR	DLF		DTT	
GMR	GSQ	TWO	DGS	DLT	DPB	DWP	

Comments ALL VIOLATIONS CORRECTED / PERMIT BY RULE

<b>VIOLATION</b>							
Add <input type="checkbox"/>		Change <input type="checkbox"/>		Delete <input checked="" type="checkbox"/>			
Agency	Number	Area	Class	Regulation Type	Regulation Citation		
S		DGS	1	S.R.			
Date Determined	Priority	Branch	Person	Returned to Compliance Scheduled		Actual	
61991						82291	

Comments NO VIOLATION EXISTS

<b>VIOLATION</b>							
Add <input type="checkbox"/>		Change <input checked="" type="checkbox"/>		Delete <input type="checkbox"/>			
Agency	Number	Area	Class	Regulation Type	Regulation Citation		
S		DGS	2	S.R.			
Date Determined	Priority	Branch	Person	Returned to Compliance Scheduled		Actual	
61991						82291	

Comments ACCUMULATION DIRTIES CORRECTED

<b>VIOLATION</b>							
Add <input type="checkbox"/>		Change <input checked="" type="checkbox"/>		Delete <input type="checkbox"/>			
Agency	Number	Area	Class	Regulation Type	Regulation Citation		
S		DGS	2	S.R.			
Date Determined	Priority	Branch	Person	Returned to Compliance Scheduled		Actual	
61991						82291	

Comments CONTAINER MUST CORRECTED

<b>VIOLATION</b>							
Add <input type="checkbox"/>		Change <input checked="" type="checkbox"/>		Delete <input type="checkbox"/>			
Agency	Number	Area	Class	Regulation Type	Regulation Citation		
S		DGS	2	S.R.			
Date Determined	Priority	Branch	Person	Returned to Compliance Scheduled		Actual	
61991						82291	

Comments CONTAINERS MARKED AND LAID OFF



☐ Required ☐ Required if pertinent ☐ Required only for previously reported data ☐ Not Required by EPA



# EVALUATION - VIOLATION - ENFORCEMENT FORM I

<b>HANDLER</b>					Date Submitted						
ID Number	PA0002277952				LDF	TSF <input checked="" type="checkbox"/>	INC	LOG <input checked="" type="checkbox"/>	SOG	TRA	09/06/91
Handler Name											

Street	City
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<b>EVALUATION</b>	Add <input checked="" type="checkbox"/>	Change	Delete
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Date	Number	Agency	Type	Reason	Branch	Person

Areas of Evaluation ( E - Evaluated, NE - Not Evaluated, NA - Not Applicable )

GOR	TGR	DCM	DGM	DWC	DPP	CAS
GPT	THR	DCL	DIN	DWR	DSI	FEA
GGR	GRR	TOR	DCP	DLB	DOR <input checked="" type="checkbox"/>	DTR
GLB	GSC		DFR	DLF		DTT
GMR	GSQ	TWD	DGS <input checked="" type="checkbox"/>	DLT	DPS	DWP

Comments

<b>VIOLATION</b>	Add	Change <input checked="" type="checkbox"/>	Delete
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Agency	Number	Area	Class	Regulation Type	Regulation Citation
5		DOR	0	S.R.	
Date Determined	Priority	Branch	Person	Returned to Compliance Scheduled	Actual
6/7/91					8/20/91

Comments MURKYSTS FOR PRETREATMENT CUSKLS

<b>VIOLATION</b>	Add	Change <input checked="" type="checkbox"/>	Delete
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Agency	Number	Area	Class	Regulation Type	Regulation Citation
5		DOR	2	S.R.	
Date Determined	Priority	Branch	Person	Returned to Compliance Scheduled	Actual
6/7/91					8/22/91

Comments SEGS HUNG

<b>VIOLATION</b>	Add	Change	Delete
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Agency	Number	Area	Class	Regulation Type	Regulation Citation
Date Determined	Priority	Branch	Person	Returned to Compliance Scheduled	Actual

Comments

<b>VIOLATION</b>	Add	Change	Delete
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Agency	Number	Area	Class	Regulation Type	Regulation Citation
Date Determined	Priority	Branch	Person	Returned to Compliance Scheduled	Actual

Comments

# EVALUATION - VIOLATION - ENFORCEMENT FORM II

ID Number	Handler Name
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<b>VIOLATION</b>									
Add <input type="checkbox"/> Change <input type="checkbox"/> Delete <input type="checkbox"/>									
Agency #	Number #	Area #	Class #	Regulation Type	Regulation Citation				
<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>					
Date Determined ▲		Priority	Branch	Person	Returned to Compliance Scheduled ▲		Actual ▲		
<input type="text"/>		<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>		<input type="text"/>		
Comments									

<b>VIOLATION</b>									
Add <input type="checkbox"/> Change <input type="checkbox"/> Delete <input type="checkbox"/>									
Agency #	Number #	Area #	Class #	Regulation Type	Regulation Citation				
<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>					
Date Determined ▲		Priority	Branch	Person	Returned to Compliance Scheduled ▲		Actual ▲		
<input type="text"/>		<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>		<input type="text"/>		
Comments									

<b>VIOLATION</b>									
Add <input type="checkbox"/> Change <input type="checkbox"/> Delete <input type="checkbox"/>									
Agency #	Number #	Area #	Class #	Regulation Type	Regulation Citation				
<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>					
Date Determined ▲		Priority	Branch	Person	Returned to Compliance Scheduled ▲		Actual ▲		
<input type="text"/>		<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>		<input type="text"/>		
Comments									

<b>ENFORCEMENT</b>									
Add <input type="checkbox"/> Change <input type="checkbox"/> Delete <input type="checkbox"/>									
Date #		Number #	Agency #	Type #	Branch		Person		
<input type="text"/>		<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>		<input type="text"/>		
Penalty Assessed ▲				Settled ▲					
<input type="text"/>				<input type="text"/>					

<b>COVERED VIOLATIONS</b>								
Agency #	Number #	Area #	Agency #	Number #	Area #	Agency #	Number #	Area #
<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>
<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>
<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>
<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>
<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>
<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>
<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>

<b>PENALTY PAYMENTS</b>			
Date	Amount	Date	Amount
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

Comments			
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## FY 1989 HAZARDOUS WASTE COMPLIANCE MONITORING AND ENFORCEMENT LOG

4. Data Entry

New ☐  
Update ☒1. EPA ID: PA10101212121915122. HANDLER NAME: LEEDS AND NORTHRUP3. ADDRESS: 351 SUMNERTOWN PIKE, NORTHWILKES, NC 274545. DATE OF INITIAL EVALUATION WHICH IS  
THE BASIS FOR THIS REPORT: 5/17/895a. AGENCY RESPONSIBLE FOR  
EVALUATION: 5  
Put code in box

E = EPA

S = State

C = Contractor/EPA X = Oversight

O = Other

B = Contractor/State

X = Oversight

6. TYPE OF EVALUATION COVERED  
BY THIS REPORT:Select Evaluation Type and insert in box: 5

1 = Compliance Eval. Inspection (CEI) 4 = Comp GWM Eval (CME)

2 = Sampling Inspection

5 = Compliance Sched. Eval

3 = Record Review

11 = Case Dev. Inspection

12 = O&amp;M Inspection

13 = CA Oversight Insp.

7. DATE OF EVALUATION COVERED BY THIS REPORT (enter only if different from 5): 8/21/89

7a. Eval. Comments: \_\_\_\_\_

## 8. CLASS and VIOLATIONS

Key.	Class of	Violations							
	Violation	GWM	C/PC	Fin. Res	Pt. B	Compl. Sch	Manifest	Land-Ban	Other
'X' = Violations, no Specialties									0
'B' = Violations & Specialty	I								
'S' = Same Viol./Specialty									0
'Z' = Pending determination	II								
'O' = No Viol or Specialty found									
Acceptable Codes									
		X	X	X	X	X	X	X	X
		S	S	S	S	S	S	S	S
		Z	Z	Z	Z	Z	Z	Z	Z
		O	O	O	O	O	O	O	O
		H	H	I*	H	C	H	H	H
				B*		B			
				H		H			

## Specialties

'I' = No insurance only

'C' = CA Schedule Violation

'H' = HPV

\* = Class : only

8a Viol. Comment: FOLLOW-UP INSPECTION - ALL VIOLATIONS CORRECTED

## 9. ENFORCEMENT ACTIONS:

Class	Area of Viol./rel.	Type (use code)	Date Action Taken	Compliance Dates		Penalty		Resp. Ag.
				Scheduled	Actual	Assessed	Collected	(use code)
I	O							
II	O							

Codes for 03 = Warning Letter

11 = Filed Civil Action

15 = CA Init. Admin Order

Resp Agcy Codes

Types of 04 = Admin. Complaint

12 = Filed Criminal Action

16 = CA Final Admin Order

E = EPA

Enforcement 05 = Final Admin. Order

18 = Civil Referral to AG/DOJ

21 = Notice of Non-comp.

S = State

Actions: 10 = Informal

19 = Final Judicial Order

22 = FFCA

X = EPA Oversight

23 = Fed. Fac. Referral to HQ

10. Enforc. Comment: \_\_\_\_\_



Commonwealth of Pennsylvania  
Department of Environmental Resources  
Bureau of Waste Management

## Inspection Report Comments

Date of Inspection 8/22/91 Identification Number FAD 002277952  
Company/Facility/Site Name LEEDS AND NORTH RUP

REINSPECTION TO VERIFY CORRECTION OF PREVIOUS VIOLATIONS NOTED IN  
INSPECTION OF 6/19/91.

ALL CONTAINERS OBSERVED AS OPEN, UNLABELLED, UNDATED, NON-DOT  
SHIPPING-CONTAINER HAVE BEEN CORRECTED. ALL CONTAINERS OBSERVED  
DEPLOYED NO VIOLATIONS. WASTE OBSERVED ON 6/19/91 IN WOODEN CRATE  
WAS TESTED AS NON-HAZARDOUS SO NO VIOLATION EXISTS AS TO PROPER  
U.S. DOT SHIPPING CONTAINER OR LACK OF LABELING. IN ADDITION <sup>ANY</sup> VIOLATION  
OF 90 DAY STORAGE RELATIVE TO CONTAINERS MARKED AS "ASBESTOS" WAS UNFOUNDED.

ALL CONTAINERS OBSERVED WERE PROPERLY MANAGED. CONTAINER  
STORAGE AREA HAS BEEN TOTALLY CLEANED AND PUT IN ORDER. BASE  
STRUCTURE COULD EASILY BE INSPECTED. ~~AND~~ NO DEFECTS WERE OBSERVED  
IN THE STRUCTURE. NO SMOKING SIGNS AND HAZARDOUS WARNING SIGNS  
WERE PLACED AROUND STORAGE AREA.

~~REMOVED~~ PROPER SIGNS WERE ADDED AT ENTRANCES TO THE ACTIVE  
PORTION OF THE FACILITY. A LOG TO RECORD PRE-TREATMENT WASTES  
AND REQUIRED INSPECTIONS HAS BEEN DEVELOPED AND IMPLEMENTED.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (signature)

Gail M. A-mitch

Date

8/22/91

Inspector (signature)

Richard J. Kelly

Date

8/22/91Page 2 of 2



# EVALUATION - VIOLATION - ENFORCEMENT FORM I

<b>HANDLER</b>		Date Submitted
ID Number	PA 002277952	LDF [ ] TSF <input checked="" type="checkbox"/> INC [ ] LOG <input checked="" type="checkbox"/> SOG [ ] TRA [ ]
Handler Name		090691

Street		City
LEEDS AND NORTHUP		NORTH CAROLAS, PA, 19454
351 SUMMERTOWN PIKE		

<b>EVALUATION</b>	Add <input checked="" type="checkbox"/>	Change	Delete
Date #	Number #	Agency #	Type #
61991		5	C.E.Z

Areas of Evaluation ( E - Evaluated, NE - Not Evaluated, NA - Not Applicable )

GOR	TGR	DCM	DGM	DNC	DPP	CAS
GPT	THR	DCL	DIM	DNR	DSI	FEA
GGR	GRR	TOR	DCP	DLB	DOR	DTR
GLB	GSC	DFR	DLF	DTT		
GMR	GSG	TWO	DGS	DLT	DPS	DWP

Comments TC RULE PERMIT BY RULE FACILITY

<b>VIOLATION</b>	Add <input checked="" type="checkbox"/>	Change	Delete
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Agency #	Number #	Area #	Class #	Regulation Type	Regulation Citation
5		DGS	1	S.R.	
Date Determined #	Priority	Branch	Person	Returned to Compliance Scheduled #	Actual #
61991					

Comments 90 DAY STORAGE

<b>VIOLATION</b>	Add <input checked="" type="checkbox"/>	Change	Delete
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Agency #	Number #	Area #	Class #	Regulation Type	Regulation Citation
5		DGS	2	S.R.	
Date Determined #	Priority	Branch	Person	Returned to Compliance Scheduled #	Actual #
61991					

Comments ACCUMULATION DATE

<b>VIOLATION</b>	Add <input checked="" type="checkbox"/>	Change	Delete
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Agency #	Number #	Area #	Class #	Regulation Type	Regulation Citation
5		DGS	2	S.R.	
Date Determined #	Priority	Branch	Person	Returned to Compliance Scheduled #	Actual #
61991					

Comments CONTAINER? NOT

<b>VIOLATION</b>	Add <input checked="" type="checkbox"/>	Change	Delete
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Agency #	Number #	Area #	Class #	Regulation Type	Regulation Citation
5		DGS	2	S.R.	
Date Determined #	Priority	Branch	Person	Returned to Compliance Scheduled #	Actual #
61991					

Comments MARKED AND LABELED

# EVALUATION - VIOLATION - ENFORCEMENT FORM II

ID Number	Handler Name
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VIOLATION						Add <input checked="" type="checkbox"/>	Change	Delete
Agency #	Number #	Area #	Class #	Regulation Type	Regulation Citation			
5		D.G.S	2	S.R.				
Date Determined #		Priority	Branch	Person	Returned to Compliance			
6/1/97					Scheduled #		Actual #	
Comments DOT CONTAINER								

VIOLATION						Add <input checked="" type="checkbox"/>	Change	Delete
Agency #	Number #	Area #	Class #	Regulation Type	Regulation Citation			
5		D.G.S	2	S.R.				
Date Determined #		Priority	Branch	Person	Returned to Compliance			
6/1/97					Scheduled #		Actual #	
Comments DOT LABEL								

VIOLATION						Add <input checked="" type="checkbox"/>	Change	Delete
Agency #	Number #	Area #	Class #	Regulation Type	Regulation Citation			
5		D.G.S	2	S.R.				
Date Determined #		Priority	Branch	Person	Returned to Compliance			
6/1/97					Scheduled #		Actual #	
Comments PA LABEL								

ENFORCEMENT						Add	Change	Delete
Date #	Number #	Agency #	Type #	Branch	Person			
Penalty Assessed #		Settled #						

COVERED VIOLATIONS								
Agency #	Number #	Area #	Agency #	Number #	Area #	Agency #	Number #	Area #

PENALTY PAYMENTS			
Date	Amount	Date	Amount
Comments			





# EVALUATION - VIOLATION - ENFORCEMENT FORM I

<b>HANDLER</b>						Date Submitted	
ID Number	LDF [ ] TSF [ ] INC [ ] LOG <input checked="" type="checkbox"/> SOG [ ] TRA [ ]				090691		
Handler Name							

Street	City
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<b>EVALUATION</b>	Add <input checked="" type="checkbox"/>	Change	Delete
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Date	Number	Agency	Type	Reason	Branch	Person
6/9/91		5	CEI			

Areas of Evaluation ( E - Evaluated, NE - Not Evaluated, NA - Not Applicable )

GOR	TGR	DCM	DGM	DNC	DPP	CAS
GPT	TMR	DCL	DIN	DNR	DSI	FEA
GGR	GRR	TOR	DCP	DLB	DOR	DTR
GLB	GSC		DFR	DLF		DTT
GMR	GSO	TWO	DGS	DLT	DPS	DMP

Comments TC RULE

<b>VIOLATION</b>	Add <input checked="" type="checkbox"/>	Change	Delete
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Agency	Number	Area	Class	Regulation Type	Regulation Citation
5		DOR	2	S.R.	

Date Determined	Priority	Branch	Person	Returned to Compliance	
6/9/91				Scheduled	Actual

Comments PRETREATMENT CURSIVE ANALYSIS

<b>VIOLATION</b>	Add <input checked="" type="checkbox"/>	Change	Delete
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Agency	Number	Area	Class	Regulation Type	Regulation Citation
5		DOR	2	S.R.	

Date Determined	Priority	Branch	Person	Returned to Compliance	
6/9/91				Scheduled	Actual

Comments SIGNS AT INTAKE PORTION

<b>VIOLATION</b>	Add	Change	Delete
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Agency	Number	Area	Class	Regulation Type	Regulation Citation

Date Determined	Priority	Branch	Person	Returned to Compliance	
6				Scheduled	Actual

Comments

<b>VIOLATION</b>	Add	Change	Delete
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Agency	Number	Area	Class	Regulation Type	Regulation Citation

Date Determined	Priority	Branch	Person	Returned to Compliance	
				Scheduled	Actual

Comments

# EVALUATION - VIOLATION - ENFORCEMENT FORM II

ID Number				Handler Name				
<div style="display: flex; justify-content: space-between;"> <span>VIOLATION</span> <span>Add</span> <span>Change</span> <span>Delete</span> </div>								
Agency #	Number #	Area #	Class #	Regulation Type	Regulation Citation			
<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>			
Date Determined ▲		Priority	Branch	Person	Returned to Compliance Scheduled ▲		Actual ▲	
<input type="text"/>		<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>		<input type="text"/>	
Comments								
<div style="display: flex; justify-content: space-between;"> <span>VIOLATION</span> <span>Add</span> <span>Change</span> <span>Delete</span> </div>								
Agency #	Number #	Area #	Class #	Regulation Type	Regulation Citation			
<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>			
Date Determined ▲		Priority	Branch	Person	Returned to Compliance Scheduled ▲		Actual ▲	
<input type="text"/>		<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>		<input type="text"/>	
Comments								
<div style="display: flex; justify-content: space-between;"> <span>VIOLATION</span> <span>Add</span> <span>Change</span> <span>Delete</span> </div>								
Agency #	Number #	Area #	Class #	Regulation Type	Regulation Citation			
<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>			
Date Determined ▲		Priority	Branch	Person	Returned to Compliance Scheduled ▲		Actual ▲	
<input type="text"/>		<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>		<input type="text"/>	
Comments								
<div style="display: flex; justify-content: space-between;"> <span>ENFORCEMENT</span> <span>Add</span> <span>Change</span> <span>Delete</span> </div>								
Date #		Number #	Agency #	Type #	Branch		Person	
<input type="text"/>		<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>		<input type="text"/>	
Penalty Assessed ▲				Settled ▲				
<input type="text"/>				<input type="text"/>				
COVERED VIOLATIONS								
Agency #	Number #	Area #	Agency #	Number #	Area #	Agency #	Number #	Area #
<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>
<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>
<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>
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PENALTY PAYMENTS								
Date		Amount		Date		Amount		
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Comments								

FY 1989 HAZARDOUS WASTE COMPLIANCE MONITORING AND ENFORCEMENT LOG

EPA

1. EPA ID: PA 010023779312

2. HANDLER NAME: LEEDS AND NORTHROP

3. ADDRESS: 351 SUMNEYTOWN PIKE, NORTH CUPLES, PA, 17454

5. DATE OF INITIAL EVALUATION WHICH IS THE BASIS FOR THIS REPORT: 6/19/91

5a. AGENCY RESPONSIBLE FOR EVALUATION: Put code in box 5

E = EPA  
S = State  
C = Contractor/EPA  
O = Other  
B = Contractor/State  
X = Oversight

4. Data Entry

New ☒  
Update ☐

6. TYPE OF EVALUATION COVERED BY THIS REPORT:

Select Evaluation Type and insert in box:

1

1 = Compliance Eval. Inspection (CEI) 4 = Comp GUM Eval (CME)  
2 = Sampling Inspection 5 = Compliance Sched. Eval  
3 = Record Review 11 = Case Dev. Inspection  
12 = O&M Inspection  
13 = CA Oversight Insp.

7. DATE OF EVALUATION COVERED BY THIS REPORT (enter only if different from 5): 1/1

7a. Eval. Comments: LAND BAN VIOLATIONS AVAILABLE / TCLP ON F006 AND F003 WASTES MULTIPLE REQUESTED TCLP ON AN F001 F002 WASTE AND AN F005 DRY WASTE - ALSO AN F001 WASTE IS GENERATED BUT IS RECYCLED

8. CLASS and VIOLATIONS

Key.	Class of Violation	Violations							
		GUM	C/PC	Fin. Res	Pt. B	Crpl. Sch	Manifest	Land-Ban	Other
'X' = Violations, no Specialties	I							0	0
'B' = Violations & Specialty								0	X
'S' = Same Viol./Specialty								0	0
'Z' = Pending determination	II							0	X
'O' = No Viol or Specialty found									
Acceptable Codes									
		X	X	X	X	X	X	X	X
		S	S	S	S	S	S	S	S
		Z	Z	Z	Z	Z	Z	Z	Z
		O	O	O	O	O	O	O	O
		H	H	I*	H	C	H	H	H
				B*		B			
				H		H			

Specialties  
'I' = No insurance only  
'C' = CA Schedule Violation  
'H' = NPV  
\* = Class I only

8a. Viol. Comment: INSPECTION IS FOLLOW-UP TO INSPECTION OF 5/23/90 HOWEVER FIRST REGISTRATION NUMBER BE VIOLATED AS CORRECTED. SAME VIOLATIONS HAVE BEEN OBSERVED IN ADDITION TO SOME ADDITIONAL VIOLATIONS

9. ENFORCEMENT ACTIONS:

Class	Area of Viol./rel.	Type (use code)	Date Action Taken	Compliance Dates			Penalty		Resp. Ag. (use code)
				Scheduled	Actual		Assessed	Collected	
I	X	03	7.8.91						
II	X	03	7.8.91						

Codes for 03 = Warning Letter 11 = Filed Civil Action 15 = CA Init. Admin Order  
Types of 04 = Admin. Complaint 12 = Filed Criminal Action 16 = CA Final Admin Order  
Enforcement 05 = Final Admin. Order 18 = Civil Referral to AG/DOJ 21 = Notice of Non-comp.  
Actions: 10 = Informal 19 = Final Judicial Order 22 = FFCA  
23 = Fed. Fac. Referral to HQ

Resp Agcy Codes  
E = EPA  
S = State  
X = EPA Oversight

10. Enforc. Comment:

Hazardous Waste Inspection Report  
Generators - Part ADate of inspection 5/19/91-6/20/91 Time start 10:00 A Time finish \_\_\_\_\_Name of inspector RICHARD J. ILLISCompany, installation name LEEDS AND NORTHROPLocation <sup>351</sup> SUMNEX TOWN PIKE, NORTH WILKES, PA., 19454County MONTGOMERY Municipality UPPER GwyneddIdentification number PAID 002277952Name of responsible official EARL ADMITAGETitle PROJECT ENGINEERMailing address SAMEArea code and telephone number 215-<sup>699</sup>243-2000

Name of person interviewed \_\_\_\_\_

Title \_\_\_\_\_

Mailing address (if different from above) \_\_\_\_\_

Area code and telephone number \_\_\_\_\_

## 1. Current waste handling method:

- a. ☒ On-site ☒ treatment, ☒ storage, ☐ disposal ☒ PBR
- b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim
- c. ☒ Off-site ☒ treatment, ☐ storage, ☒ disposal
- d. ☒ Off-site ☐ use, ☐ reuse, ☐ recycle, ☒ reclaim

## 2. Amount of hazardous waste produced:

- a. 1100 kg./mo. BASED ON 1<sup>ST</sup> QUARTER 1991
- b. 13,200 kg./yr.

## 3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
<u>F006</u>	<u>ENVIRITE CORP.</u> <u>1600 PA. AVE</u> <u>YORK, PA., 17404 717-846-1900</u>	<u>TCLP AVAILABLE</u>
<u>F001, F003</u> <u>F005</u>	<u>SAFETY KLEEN CORP</u> <u>1200 SYLVAN ST.</u> <u>LINDEN, N.J., 07036 201-826-2000</u>	<u>TCLP ON F003</u>
<u>D001 (D039)</u>	<u>SAFETY KLEEN CORP.</u> <u>1140-1142 GREENHILL RD.</u> <u>WESTCHESTER, PA., 19380 215-430-0096</u>	

Hazardous Waste Inspection Report  
Generators — Part B

1—No Violation Observed				2—Not Applicable	3—Not Determined	4—Non-Compliance
Status				REQUIREMENT		Chapter Citation
1	2	3	4			75.262
X				Hazardous waste determination, copies available <i>TC RULE CHECKED</i>		(b)
X				Identification number		(c)(1)
X				Hazardous waste shipments offered only to licensed transporters		(c)(4)
X				Authorization received from TSD facility for wastes shipped off-site		(d)
X				PA manifest used for intrastate shipments		(e)(2)
X				Disposer state manifest or EPA format manifest used for out-of-state shipments		(e)(3)
X				Manifests filled out properly and completely		(e)(7)
X				Manifests routed properly and within time limits (7 days)		(e)(14) or (15)
			X	Proper U.S. DOT shipping containers or packages		(f)(1)(i)
			X	Shipping containers marked and labeled according to U.S. DOT		(f)(1)(ii)
			X	Containers of 110 gal. or less marked with required PA label		(f)(1)(iii)
X				Placards offered to transporter		(f)(2)
			X	Wastes accumulated on-site for less than 90 days		(g)(1)(i)
			X	Wastes stored in proper containers and properly marked and labeled		(g)(1)(ii)
			X	Containers managed in accordance with 75.265(q)(1)–(9)		(g)(1)(iii)
			X	Containers clearly marked with accumulation date and visible for inspection		(g)(1)(iv)
X				Records retained at designated location for 20 years		(h)
X				Quarterly reports submitted to the Department		(i)
X				Exception reporting procedures followed		(j)
	X			Hazardous waste disposal plan, if required		(l)
X				Spill reporting procedures followed		(m)(1)
X				Preparedness, Prevention and Contingency Plan and implemented		(m)(5)
	X			Special requirements followed for international shipments		(o)
X				On the job or classroom personnel training program [75.265(f)]		(g)(1)(6)
X				Drum accumulation area inspected weekly as per 75.265(q)(5)		(g)(1)(iii)
X				<i>TANKS L</i>		<i>265.190</i>
X				<i>PREPAREDNESS AND PREVENTION PROCEDURES</i>		<i>265.31</i>
X				<i>EMERGENCY PROCEDURES</i>		<i>265.51</i>
X				<i>MANIFESTS LEGIBLE (ALL COPIES)</i>		<i>262.23(h)</i>

PERMIT BY RULE REQUIREMENTS

1 - no violation observed  
2 - not applicable  
3 - not determined  
4 - noncompliance

Chapter Citation	Requirements	Compliance Status			
		1	2	3	4
265.14(b)(1)	Active portion has 24 hour surveillance.	X			
265.14(b)(2)	Artificial barrier surrounds active portion.	X			
265.14(c)	Proper signs are posted.				X
265.15(b)(1)	Inspection schedule is on-site.	X			
265.15(c)	Inspections are conducted as per inspection plan.	X			
265.15(d)	Deterioration and/or malfunctions of equipment corrected as revealed by inspections.	X			
265.15(d)	Immediate remedial action taken when a hazard is imminent or already present.	X			
265.15(e)	Inspection log is maintained and utilized properly.	X			
265.32(1)	Facility is equipped with internal alarm system capable of providing immediate emergency instruction to personnel.	X			
265.32(2)	Facility is capable of summoning outside emergency assistance.	X			
265.32(3)	Facility is equipped with spill and decontamination control equipment.	X			
265.33	Facility communications and/or alarm systems and spill and decontamination control equipment is periodically tested and maintained.	X			
265.35	Adequate aisle space is maintained to allow unrestricted access for personnel and emergency equipment.	X			
265.53(1)	A copy of the PPC plan and all revisions to the plan is available at the facility.	X			
265.52(d)	The contingency plan contains an up-to-date list of names, addresses and phone numbers of all persons qualified to act as emergency coordinator.	X			
265.55	One employee is designated as the primary emergency coordinator and is either on-site or on call at all times.	X			
265.73(a)	Operating records are maintained at the facility. Records contain the following:	X			
265.73(b)(1)	Description and quantities of wastes treated and discharged under PBR.				X
265.73(b)(3)	Results of waste analyses and trial tests performed under 265.13.	X			
265.73(b)(4)	Summary reports and details of any incidents requiring implementation of the contingency plan.	X			

**PERMIT BY RULE REQUIREMENTS**  
(Continued)

1 - no violation observed  
2 - not applicable  
3 - not determined  
4 - noncompliance

Chapter Citation	Requirements	Compliance Status			
		1	2	3	4
265.73(b)(5)	Results of all on-site inspections, including those outlined in 265.15(e) below.	X			
265.77(a)	Emissions, discharges, fires, explosions and groundwater contamination reported to the Department as required.	X			
265.74(a)	Records maintained under Section 264(k) are available to the Department.	X			
265.177 265.17(a)(b)	Special precautions are taken to prevent accidental ignition or reaction of hazardous wastes.	X			
265.173(b) 265.194(b)	Hazardous waste or treatment reagents are not placed in a treatment process or equipment if they could cause it to rupture, leak, corrode or otherwise fail.	X			
265.194(2)	Continuously fed equipment is fitted with a means of stopping the inflow.		X		
265.194(e)	When facility treats a waste which is substantially different from previously treated wastes, the owner or operator shall:  Conduct waste analyses and trial treatment tests or substitute written documentation to show that the proposed process will not cause ignition, reaction, or damage to equipment.		X		
265.195(1)	The following minimum inspections are performed and results recorded:	X			
	Discharge control and safety equipment at least once each operating day.				
265.195(2)(3)	Data from process monitoring equipment at least once each operating day to ensure proper operation.	X			
265.195(4)	Construction materials of the treatment process and equipment at least once weekly to detect corrosion or leaks.	X			
265.195(5)	Construction materials of discharge containment structures and immediate surrounding area at least weekly to detect erosion or leaking.	X			

Hazardous Waste Inspection Report  
Land Disposal Restriction Supplemental Checklist

1-No Violation Observed					2-Not Applicable	3-Not Determined	4-Non-Compliance
Status					REQUIREMENT		Citation
1	2	3	4	40 CFR Part 268			
					<b>Generators</b>		
X					Notification sent with shipments of wastes that do not meet treatment standards.		7(a)(1)
X					Notification and certification sent with shipments of wastes meeting treatment standards.		7(a)(2)
X					Dilution not used as a substitute for treatment.		3
X					Records maintained of notifications, certifications, waste analysis, and documentation supporting use of knowledge for waste classification.		7(a)(5), (a)(6)
					<b>Storage Facilities</b>		
					Facility verifies generators classification of waste in accordance with waste analysis plan.		25 Pa Code 265.13(c)
					Containers marked to identify contents and accumulation date.		50(a)(2)
					Notification sent with shipments of wastes that do not meet treatment standards.		7(a)(1)
					Notification and certification sent with shipments of wastes meeting treatment standards.		7(a)(2)
					Facility maintains records of documents produced pursuant to LDR requirements.		7(a)(6)
					<b>Treatment Facilities, including PBR and RRR Facilities</b>		
X					Dilution not used as a substitute for treatment.		3
X					Facility tests wastes or treatment residues to determine compliance with applicable treatment standards in accordance with waste analysis plan.		7(b)
X					Certification and/or notification sent with shipments of waste.		7(b)(4), (b)(5), (b)(6)
					<b>Land Disposal Facilities</b>		
					Facility tests wastes received to assure compliance with applicable treatment standards.		7(c)(2)
					Facility land disposes of restricted waste only if it meets applicable treatment standard.		40
					Facility retains copies of generator notifications and certifications.		7(c)(1)



## Inspection Report Comments

Date of Inspection 6/19 & 20/91 Identification Number PA0002377952  
Company/Facility/Site Name LEEDS AND NORTHRUP

THESE CHANNELS SHOULD BE CLEANED. ADDITIONALLY, BUILD-UPS OF SUCH  
DEBRIS SHOULD PROBABLY BE NOTED IN WEEKLY INSPECTIONS AND CORRECTED  
PROMPTLY. CONTAINMENT STRUCTURE WILL BE INSPECTED ON FOLLOW-UP.  
265.14 (C) PROPER SIGN (AT ACTIVE PORTION OF FACILITY) WITH THE LEGEND,  
"DANGER - UNAUTHORIZED PERSONNEL KEEP OUT" (OR SIMILAR SIGNS WHICH  
INDICATE "DANGER" AND "UNAUTHORIZED PERSONNEL SHOULD NOT ENTER") SHOULD  
BE POSTED AT EACH ENTRANCE TO ACTIVE PORTION OF FACILITY. CURRENTLY,  
THERE ARE NO SUCH SIGNS AT 3 OR 4 ENTRANCES OBSERVED.  
SIMILARLY, IT IS SUGGESTED THAT THROUGHOUT THE FACILITY "NO SMOKING" OR  
SIMILAR WARNINGS BE POSTED AT ANY LOCATIONS WHERE IGNITABLE  
CURSTES ARE COLLECTED OR STORED.

FILTERS USED IN BOOTH OF PAINTING OPERATION SHOULD BE TESTED AS  
TO POTENTIAL HAZARDOUS CHARACTERISTICS. ENAMEL, LATEX AND ACRYLIC  
PAINTS ARE USED THEREFORE SOLVENTS OR METAL CONCENTRATIONS COULD BE  
SIGNIFICANT.

TCLP AND LAND-BAN INFORMATION REVIEWED. TCLP'S ARE NOT  
AVAILABLE ON FREON CURST (FOO1) AND PAINT/MINERAL SPIRITS WASTE (FOO2)  
CURRENTLY LEEDS & NORTHRUP WERE UNAWARE OF THE NEED TO SUBMIT  
AN ANNUAL OPERATIONS REPORT. THE ANNUAL REPORT SHOULD INDICATE  
ANY PRE-TREATMENT WASTES GENERATED AND TREATED ON-SITE IN THE

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (signature) COPY MAILED TO FACILITY Date \_\_\_\_\_

Inspector (signature) Richard J. Kelly Date 6/20/91

Page \_\_\_\_\_ of \_\_\_\_\_

## Inspection Report Comments

Date of Inspection 6/19 & 20/91 Identification Number PAC002277952  
Company/Facility/Site Name LEEDS AND NORTHROP

DRUMS WERE ALSO OPEN WHEN OBSERVED. DRUM (55 GALLON) OF FREON WASTE  
AND NO ACCUMULATION DATE. IN WASTE <sup>STORAGE</sup> CONTAINMENT AREA OPEN 55 GALLON  
DRUM F006 FILTERCAKE, 1-30 GALLON DRUM CARBON TETRACHLORIDE NO  
ACCUMULATION DATE OR WASTE NO.; OPEN 55 GALLON NO LABEL OR  
ACCUMULATION DATE WITH WHITISH POTENTIALLY CRUSTIC MATERIAL INSIDE  
DRUM ALSO IS BADLY CORRODED INSIDE AND OUTSIDE. ALSO IN WASTE  
STORAGE CONTAINMENT AREA 3-55 GALLON AND ONE-30 GALLON DRUMS  
DATED 9/13 OR 15/90, LABELED AS ASBESTOS. MR. ARMSTRONG STATED  
THE MATERIAL IS NOT ASBESTOS (NON-HAZARDOUS) HOWEVER THE DRUMS DO HAVE  
A HAZARDOUS WARNING LABEL. THESE DRUMS SHOULD BE TESTED AND  
DISPOSED OF, OTHERWISE THEY ARE LABELED HAZARDOUS AND SUSPECTED TO BE  
HAZARDOUS. THESE 4 DRUMS ALSO, IF HAZARDOUS, ARE IN VIOLATION OF  
264.34 - 90 DAY OR LESS ACCUMULATION. LACK OF <sup>ACCUMULATION</sup> DATES ON DRUMS IS ALSO  
IN VIOLATION OF 262.34<sup>(a)</sup>(4).

OPEN DRUMS OF WASTE ARE A VIOLATION OF CONTAINED MGT. REGULATION  
(262.34(c)(3)) 265.173(c). SECTION 265.178(c) REQUIRES THAT A  
CONTAINMENT SYSTEM BE FREE OF CRACKS, GAPS, ETC. BEING THAT A  
SIGNIFICANT AMOUNT OF "DEBRIS" HAS ACCUMULATED IN THE CHANNELS WHICH  
SURROUND THE INSIDE PERIMETER OF THE CONTAINMENT SYSTEM, AN ADEQUATE  
INSPECTION COULD NOT BE PERFORMED OF THE CONTAINMENT BASE STRUCTURE

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

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Person Interviewed (signature) COPY MAILED TO FACILITY Date \_\_\_\_\_

Inspector (signature) Richard J. Kelly Date 6/20/91

Page \_\_\_\_\_ of \_\_\_\_\_

## Inspection Report Comments

Date of Inspection 5/19/91 AND 6/20/91 Identification Number PAD 002277952Company/Facility/Site Name LEEDS AND NORTHUPPERMISSION TO CONDUCT INSPECTION GIVEN BY THE OPERATIONS MANAGER

INSPECTION IS TO BE FOLLOW-UP TO INSPECTION OF 5/25/90 HOWEVER, IT IS NOT POSSIBLE TO DETERMINE IF PAST VIOLATIONS WERE ACTUALLY CORRECTED. CORRESPONDENCE BETWEEN LEEDS AND NORTHUP AND THE DEPT. INDICATES THAT VIOLATIONS WERE CORRECTED. THIS INSPECTION OBSERVED SIMILAR VIOLATIONS AS NOTED IN THE INSPECTION 5/25/90 IN ADDITION TO SOME ADDED VIOLATIONS.

VIOLATIONS OBSERVED ARE:

262.30(1) PROPER U.S. DOT SHIPPING CONTAINERS - OBSERVED IN CONTAINMENT AREA, WASTE STORED IN WOODEN CONTAINER. CONTAINER OPEN TO ALLOW WASTE TO DRY. MEASURES 3' X 6' X 12" DEEP. CONSISTS OF FLOOR SCRAPPINGS (NICKEL, ZINC AND CAUSTIC WASTE). ALSO POTENTIAL LAB-PACK WASTES IN ORIGINAL BOTTLES - SHOULD BE STORED SEPARATELY UNTIL LAB PACK IS ASSEMBLED.

262.30(2)(3) CONTAINERS SHOULD BE LABELED AND MARKED - OBSERVED AT END AND 262.34(9)(4) OF ELECTROPLATING OPERATION IN ROOM WHERE PRESS OPERATES A 5 GALLON AND 262.34(9)(3) PLASTIC DRUM OF NICKEL SLUDGE NO LABEL OR ACCUMULATION DATE. ALSO, 265.173(9) 55 GALLON DRUM OF ELECTROPLATING WASTE NO LABEL OR ACCUMULATION DATE. IN LAQUER ROOM 55 GALLON DRUM OF PRINT WASTE MENEROL SPIRITS NO LABEL OR ACCUMULATION DATE. ALL OF THE ABOVE MENTIONED

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

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Person Interviewed (signature) COPY MAILED TO FACILITY Date \_\_\_\_\_Inspector (signature) Richard J. Kelly Date 6/20/91

Page \_\_\_\_\_ of \_\_\_\_\_

## Inspection Report Comments

Date of Inspection 6/19/90/91Identification Number PA0002277957Company/Facility/Site Name LEEDS + NORTHROP

ACTIVE PORTION OF THE FACILITY APPROPRIATE FORMS HAVE BEEN MAILED  
TO THE FACILITY FOR THEIR USE.

RECOMMEND THAT THE FACILITY EXAMINE THE VOLUME OF WASTE'S  
STORED IN ITS CONTAINER STORAGE AREA RELATIVE TO THE VOLUME OF  
THE CONTAINMENT STRUCTURE - BOTH PROWERS AND WASTE'S. ALSO,  
AN EXAMINATION OF POTENTIALLY INCOMPATIBLE MATERIALS IN THAT AREA  
SHOULD BE PERFORMED.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (signature) COPY FURNISHED TO FACILITY

Date \_\_\_\_\_

Inspector (signature) Richard J. KellyDate 6/20/91

Page \_\_\_\_\_ of \_\_\_\_\_





COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL RESOURCES

Lee Park, Suite 6010  
555 North Lane  
Conshohocken, PA 19428  
215 832-6212

July 8, 1991

Mr. Earl Armitage  
Project Engineer  
Leeds and Northrup  
351 Summeytown Pike  
North Wales, PA 19454

Re: Hazardous Waste Inspection  
PAD 002277952 June 19, 1991  
Upper Gwynedd Township  
Montgomery County

NOTICE OF VIOLATION

Dear Mr. Armitage:

This letter is to confirm the findings of the Department's referenced inspection of your hazardous waste activities. Requirements for hazardous waste facilities are contained in Chapters 260 through 270 of the Rules and Regulations of the Department. Violations of applicable sections of these regulations found during our inspection are as follows:

262.30

Before transporting or offering a shipment of hazardous waste for transportation off-site, a generator shall perform the following:

1. Place the hazardous waste in containers or packages meeting United States Department of Transportation requirements under 49 CFR Parts 173, 178 and 179.
2. Label and mark each container or package in accordance with DOT requirements under 49 CFR Part 172.
3. Permanently mark each container of 110 gallons or less of hazardous waste according to U.S. DOT requirements under 49 CFR 172.304 with the following:

HAZARDOUS WASTE-FEDERAL LAW PROHIBITS IMPROPER DISPOSAL. If found contact the nearest police or public safety authority, or the Environmental Protection Agency.

Mr. Earl Armitage

July 8, 1991

- 2 -

Generator's Name and Address \_\_\_\_\_  
Manifest Document Number \_\_\_\_\_

262.34(a)

A generator may accumulate hazardous waste on-site without a permit for 90 days or less if:

- 1) The waste is shipped off-site or treated or disposed of on-site within 90 days or less.
- 2) The waste is placed in containers which meet U.S. DOT packaging, marking and labeling requirements in §262.30.
- 3) Containers are managed in accordance with Chapter 265 Subchapter I.
- 4) On each container, each date on which any hazardous waste was placed in that container shall be clearly marked and visible for inspection.

265.14(c)

Unless exempt under subsection A, a sign with the legend, "Danger-Unauthorized Personnel Keep Out" shall be posted at each entrance to the active portion of a facility.

265.77(b)

The owner or operator of a captive treatment or disposal facility or an on-site storage facility shall submit to the Department, on a form provided by the Department, by March 1 of each year, a description of the facilities activities during the previous calendar year including a description of each hazardous waste managed, the amount and units of measure of each hazardous waste managed and the method of treatment storage or disposal for each hazardous waste. The form shall be maintained for the life of the facility as part of its operating record.

Observed during the inspection, in the container storage area, was a wooden open-top container measuring approximately 3 feet by 6 feet by 10 inches deep. The container was used as a drying bed for floor scrapings consisting of nickel, zinc and caustic wastes. Other containers observed both in the containment area and throughout the facility at a variety of collection points included: A 5 gallon plastic drum holding nickel waste, a 55 gallon drum of electroplating

Mr. Earl Armitage

July 8, 1991

- 3 -

waste, a 55 gallon drum of paint waste mineral spirits in the lacquer room, and a 55 gallon corroded drum holding a white caustic material. All of the above containers were open and lacking proper labeling and accumulation dates. Also observed were a 55 gallon drum of freon waste lacking an accumulation date, a 55 gallon drum of electroplating waste in the storage area which was open, a 30 gallon drum of carbon tetrachloride with no accumulation date or waste number and 4 drums, (3-55 gallon, 1-30 gallon) dated September 13 or 15/90 labeled with a hazardous waste label that indicated asbestos waste. The material was identified by facility personnel as not being asbestos. No other identification of the waste was indicated.

The wooden container is not a proper U.S. DOT shipping container. It is also not proper for containers to be without DOT required labeling and markings, or to be without a "Hazardous waste" warning label.

A generator may accumulate hazardous waste for 90 days or less if the waste is contained in such a manner that meets U.S. DOT packaging, marking and labeling requirements. In addition, the generator must correctly manage containers of hazardous waste as described in Chapter 265 Subchapter I of the hazardous waste regulations, and record on each container the date on which hazardous waste was placed in that container. The observed containers were neither properly managed according to §265.173 (Subchapter I) nor were accumulation dates recorded on the containers. In addition, the 4 containers incorrectly marked as "asbestos" do have hazardous waste warning labels and are dated in excess of the maximum 90 day storage. A generator who accumulates hazardous waste for more than 90 days is the operator of a storage facility and requires a permit. Leeds and Northrup does not have such a permit.

Also noted during the inspection was the lack of adequate warning signs at entrances to the active portion of the facility. Signs with the legend, "Danger-unauthorized Personnel Keep Out", or signs with a similar warning, are required. Such signs were not posted at three of four entrances observed.

An annual operational report is also required from the owner or operator of a captive treatment facility. Leeds and Northrup performs hazardous waste treatment at their captive facility and therefore should submit an annual report. No such reports have been submitted to the Department or are part of the operational record of Leeds and Northrup.

You are hereby notified of both the existence of these violations as well as the need to provide for their prompt correction. Toward this end, you are requested to submit to the Department within fourteen (14) days a proposed program and schedule for abatement of these violations. The Department's inspection report contains time periods of completion of remedial actions. These reports are

Mr. Earl Armitage

July 8, 1991

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either enclosed or have been previously supplied to you. If your proposed abatement program indicates certain corrections cannot be completed within these time periods, you are requested to supply justification for any extensions.

This letter does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising prior to or after the issuance of this letter or the conditions upon which the letter is based. This letter shall not be construed so as to waive or impair any rights of the Department of Environmental Resources, heretofore or hereafter existing.

This letter shall also not be construed as a final action of the Department of Environmental Resources.

If you have any questions concerning this matter, please feel free to contact me at The Bureau of Waste Management; phone 215 832-6212.

Very truly yours,



RICHARD J. ILLIG  
Waste Management Specialist

cc: US EPA/RCRA Enforcement  
Division of Compliance & Monitoring  
Compliance  
Ms.Kurtz  
Re 30 (3)184.10/.1





**LEEDS & NORTHRUP**  
A UNIT OF GENERAL SIGNAL

Sumneytown Pike • North Wales, PA 19454

JUL 19 1991  
July 17, 1991

Mr. Richard Illig  
Waste Management Specialist  
Commonwealth of Pennsylvania  
Department of Environmental Resources  
Lee Park, Suite 6010  
555 North Lane  
Conshohocken, PA 19428

RE: Notice of Violation - July 8, 1991 - PAD002277952

Dear Mr. Illig:

This letter is in response to your plant visit of June 19 and your subsequent report of July 8 referenced above. I have attempted to address each concern with a response and time frame. Per our conversation today, I will call you when all items are in their final completion.

- Wooden open-top container 3'X6'X10": We have cleaned up the container and its plastic liner - See Attachment #4(a).

The floor scrapings and materials contained in the rack were not TCLP hazardous, i.e., nickel, zinc, pH 11 caustic. We dry and handle this material as if it was a hazardous waste and send it to a secure landfill -- please identify the section of the code we were violating.

- The 5-gallon plastic drum with the nickel waste was drummed and labelled on 6/20/91 and removed by Envirite on 6/25/91.
- The 55-gallon drum of electroplating waste filter cake was labelled on 6/20/91 and removed by Envirite on 6/25/91. Also see Attachments #3 & 4(c).
- The 55-gallon drum of white caustic material was covered and labelled 6/20/91. See Attachment 4(e).
- The 55-gallon drum of freon waste was properly labelled on 6/20/91.
- The Carbon Tetrachloride is properly labelled and will be disposed. I'm presently profiling to a vendor for removal.
- The four (4) drums of material from the boiler stack which were labelled hazardous (but, as was explained, were suspected non-hazardous) have been tested by BCM Labs and found to be non-hazardous. See Attachment #5 for chain of custody and Attachment #7 for reported results.

continued...

Richard Illig, DER  
Re: Notice of Violation  
July 17, 1991

Page 2.

- Adequate warning signs at three (3) entrances to Plating Room and vacuum filter room. Work Order #91160 (Attachment #1) of 6/21/91 has been assigned to provide notification of "Authorized Personnel Only" at all entrances. They will be located in proximity to the three "Eye Protection", "No Eating/Beverages", "No Smoking" signs posted at each entrance.
- We have received the 55ANN Report and will file for 1990 based on best available information. A form to log activity for the remainder of 1991 is enclosed as Attachment #6 in my letter of July 12.
- "No Smoking" signs on Waste Storage/Containment -- Work Order #91170 of 7/3/91 has been assigned to provide notification of "No Smoking" at both entrances to the facility.

Sincerely,



Earl W. Armitage, Jr.  
Project Engineer

EWA:br

Attachments



# MAINTENANCE WORK ORDER

W.O.# 91160 *DKH*

Press Firmly - Use Ball Point Pen

ORIGINATOR: E. ARMITAGE EXT.: 2420 M.D.: 235 LOCATION: PESD  
DATE: 6/21/91 COST CENTER: 6901 MGR.'S SIGNATURE: E. Armitage  
☒ SAFETY ☐ URGENT ☐ ROUTINE DATE DESIRED: ASAP

BRIEF DESCRIPTION OF MAINTENANCE REQUESTED: POST THESE FOUR (4) "AUTHORIZED  
PERSONNEL ONLY" SIGNS ON CHESTNUT STREET AT THE 3 PLATING  
ROOM ENTRANCES & THE VACUUM FILTER ROOM

BRIEF DESCRIPTION OF MAINTENANCE COMPLETED: \_\_\_\_\_

MAINTENANCE EMPLOYEES	REG. HRS.	1½	DBL	MATERIALS USED

MAINTENANCE SUPERVISOR SIGNATURE: \_\_\_\_\_

DISTRIBUTION: (White) - MAINTENANCE, M.D. 259, (Canary) - RETURNED TO ORIGINATOR, (Pink) - RETAINED BY ORIGINATOR.



Attachment #1

# MAINTENANCE WORK ORDER

W.O.# 91170

Press Firmly - Use Ball Point Pen

ORIGINATOR: Earl Armistage EXT.: 2420 M.D.: 235 LOCATION: PESD  
 DATE: 7/3/91 COST CENTER: 694 MGR.'S SIGNATURE: C.W. Armistage  
☒ SAFETY ☐ URGENT ☐ ROUTINE DATE DESIRED: ASAP

BRIEF DESCRIPTION OF MAINTENANCE REQUESTED: POST THESE 2 NO Smoking  
Signs on Waste Storage Entrances - Rehang other  
no Smoking sign which was dislodged from its original  
location

## FOR MAINTENANCE USE ONLY

BRIEF DESCRIPTION OF MAINTENANCE COMPLETED: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

MAINTENANCE EMPLOYEES	REG. HRS.	1 1/2	DBL	MATERIALS USED

MAINTENANCE SUPERVISOR SIGNATURE: \_\_\_\_\_

DISTRIBUTION: (White) - MAINTENANCE, M.D. 259, (Canary) - RETURNED TO ORIGINATOR, (Pink) - RETAINED BY ORIGINATOR.

July 3, 1991

TO: Keith Ashlock

cc: Dennis Hurchalla  
Tom Johnson

FROM: Earl Armitage

SUBJECT: WASTE LABELING IN SATELLITE ACCUMULATION AREAS

REFERENCE: Our Meeting, July 2, 1991

This note is to minute yesterday's meeting with Messrs. Brown (Plating) and Horne (Lacquer) to re-address the proper labeling of our satellite waste drums.

Approximately a year ago, we reaffirmed the proper labeling of satellite waste drums upon the first deposit of waste material to them. This procedure was being adhered to upon subsequent checks of the procedure.

During the DER inspection of our facility on 6/19/91, it was noted that both areas had drums with accumulated waste and no labels. We have now stressed the importance of proper labeling at our referenced meeting and anticipate no subsequent problems in these areas. Messrs. Brown and Horne will also instruct backup personnel on proper labeling to address instances of their unavailability. Both have an adequate supply of blank labels and should see you or me to replenish.

Thank you for your cooperation with this matter.



Earl W. Armitage

EWA:br  
label

July 10, 1991

To: Corky Emele ✓  
cc: Dennis Hurchalla  
Phil Swift  
From: Earl Armitage  
Subject: Work Storage/Containment Building

An inspection by the DER on June 19 & 20 revealed some handling/house-keeping practices which are deficient:

- a • the wooden drying container with the plastic liner is considered an improper DOT shipping container - DER regulations require all ~~waste~~ containers to be covered and be DOT approved. On June 20th I instructed Phil to clean the container & drum it - Envirite removed the contents on June 25th. We can not use this structure/container- please remove from building.
- b • lab pack wastes in original bottles waiting to be Lab Packed must be stored separately from drummed waste streams-use Recorder Truck to accumulate these items.
- c • all F006 Filter Cake Waste must be covered.
- d • there is a 30 gallon drum of waste Carbon Tetrachloride which has no accumulation date & no waste number-I will make arrangements to dispose thru one of our waste vendors.  
NOTE: All future drummed liquid wastes should be in 55 gallon drums.
- e • a 55 gallon drum of "whitish, potentially caustic material" in a 55 gallon open drum was found it was caustic cleaner from the industrial washer/Tumbling Area - Envirite removed June 25th.
- f • the drum of non-hazardous insulation material we bagged & drummed from the boiler repair contractor & labelled "asbestos" to alleviate anyone inadvertently handling, must be tested to verify it is non hazardous. I will take samples to BCM for analysis and then proceed with proper disposal.
- g • concrete containment channels that extend along the entire perimeter of the structure must be kept free of all leaves & debris-this is part of the weekly inspection & correction on the structure.
- h • must hang/rehang "No Smoking" signs at both entrances. I will provide to you - see work order #91170.
- i • must segregate incompatible materials on containment structure.

Call



July 12, 1991

To: Keith Ashlock

cc: Dennis Hurchalla  
Tom Johnson

From: Earl Armitage

Subject: Plating Room Treatment Tank-Log of Treatment

The PADER has requested we file an annual report (PA 55ANN) on our treatment in the plating room tanks. The attached form is for Bill Brown to log our activity. Bill has been instructed on its usage & has a 5 year supply.

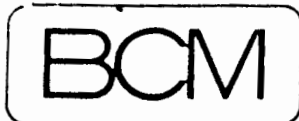
Thanks for your cooperation.

Carl



\* GALLONS :  $48'' (\text{Seam}) = 700$

$$60'' (\text{pipe bottom}) = 900$$
[illegible]



# BCM Laboratory Division

1850 Gravers Road  
Norristown, PA 19401  
(215) 275-0281

## FINAL REPORT

PAGE : 1

This is a final report.

The results have been checked and authorized for release.

### CLIENT

Leeds & Northrup Company, Inc.  
Attn: Earl Armitage  
Sumneytown Pike  
North Wales, Pa. 19454

Date : 07/15/91  
BCM # : 80-0168-0100  
P.O.# : SN370  
Order# : 41621

BCM Sample #: 122259  
Location : BOILER STACK  
Client ID : INSULATION

Date Sampled : 07/10/91  
Date Received : 07/10/91  
Sampler : EA

Test Description	Results	Units
-----	-----	-----
Bulk Asbestos (PLM & Dispersion Staining) by J. BROOKS on 07/15/91		
EPA-600/M4-82-020		
Color	WHITE	
Amosite - Asbestos	N/D	%
Chrysotile - Asbestos	N/D	%
Crocidolite - Asbestos	N/D	%
Tremolite - Asbestos	N/D	%
Anthophyllite - Asbestos	N/D	%
Actinolite - Asbestos	N/D	%
Filler	80	%
Other fibers : cellulose	20	%
Other fibers : fibrous glass	N/D	%

Comment: N/D - Not detected

Results apply only to sample as received



# BCM Laboratory Division

1850 Gravers Road  
Norristown, PA 19401  
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## FINAL REPORT

PAGE : 2

This is a final report.

The results have been checked and authorized for release.

### CLIENT

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Location : BOILER STACK  
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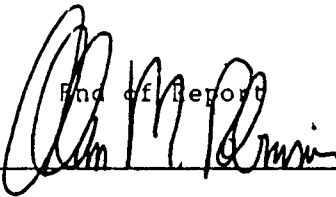
Date Sampled : 07/10/91  
Date Received : 07/10/91  
Sampler : EA

### Test Description

Results Units

-----

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End of Report  


Certified by : \_\_\_\_\_

BCM Laboratory Director

### Lab Certifications:

PA - 46-007	NJ - 77175	NVLAP - 1374	AL - 40300	MD - 136
VA - 00023	SC - 89005	WV	DE	RI
NYDOH - 11136	AIHA - 19401	MA		

NVLAP Accreditation or any of its test reports in no way constitutes or implies product certification, approval, or endorsement by NIST.

Analyst: \_\_\_\_\_

Date: \_\_\_\_\_

7-15-91

Analyst: \_\_\_\_\_

Date: \_\_\_\_\_